

State of Wisconsin
Department of Administration
(DUNS No. 80-903-5728)

2015-2019 Consolidated Plan



State of Wisconsin ■ Scott Walker, Governor
Department of Administration ■ Scott Neitzel, Secretary

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EXECUTIVE SUMMARY

ES-05 EXECUTIVE SUMMARY - 91.300(C), 91.320(B)

Introduction

The Wisconsin 2015-2019 Consolidated Plan, developed by the Department of Administration's Division of Housing (DOH), details the Division of Housing's overall strategy for addressing housing, community, and economic development needs. The focus of the activities and strategies described in this Consolidated Plan is on the evolving needs of low- and moderate-income persons, including persons with special needs. A central theme throughout this Plan is the development of strategies offering flexibility, responsiveness, and accountability. The Wisconsin 2015-2019 Consolidated Plan defines how the Division of Housing will distribute grant funds to local governments, public and private organizations, and businesses. The majority of these funds are U.S. Department of Housing and Urban Development (HUD) formula grants for:

- Small Cities Community Development Block Grants (CDBG)
- HOME Investment Partnerships (HOME)
- Emergency Solutions Grants (ESG)
- Housing Opportunities for Person with AIDS (HOPWA)

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Housing areas of special focus for this Plan will include the promotion of residential rehabilitation; rental assistance; and assistance for the homeless and special needs populations, with the priority given to households at the lowest income levels. Resources will be directed to projects that address the need for safe, decent, and affordable housing for a variety of populations.

Funding projects that help support the infrastructure and public facilities of communities is another top priority of this Plan. Community development activities include the replacement or reconstruction of deteriorating infrastructure, the construction or rehabilitation of essential community facilities such as community centers, senior centers, and libraries. Resources will be directed to projects that alleviate threats to public health, safety, or welfare, reduce slum and blight, or respond to an urgent local need.

Additionally, this Plan will focus on helping local governments assist businesses in creating and retaining jobs for individuals with low and moderate incomes. Economic development program resources will be directed to projects that create and expand economic opportunity in Wisconsin communities.

Highlighting these focus areas, the Division of Housing has identified five high priority needs and 14 goals. The high priority needs are:

- Affordable Housing: fund the construction and rehabilitation of affordable housing, and provide rental and down payment assistance to lower income households.
- Homelessness: provide funding for emergency shelter, street outreach, prevention, and rapid re-housing.
- Special Needs Assistance: assist persons experiencing homelessness, special needs populations, and persons with HIV/AIDS.

- Community Development: address community development needs such as the need for public facilities and planning grants.
- Economic Development: address economic development needs through economic development loans and job training.

The Division of Housing's 12 goals are:

- Rehabilitate Owner Occupied Housing
- Rehabilitate Rental Housing
- Build New Rental Housing
- Provide Down payment Assistance for Homebuyers
- Provide Tenant-Based Rental Assistance for Homeless or Special Needs Populations
- Provide Assistance to Those Experiencing Homelessness or at Risk of Homelessness
- Assist Communities with Public Facilities Projects
- Create and Retain Jobs through Economic Development Assistance and Job Training
- Increase Housing Options for Persons Living with HIV/AIDS
- Increase Access to Benefits for those Living with Mental Health Issues
- Assist Communities with Local Planning
- Special Projects

Evaluation of past performance

The Division of Housing will continue to build upon the progress made over the past 5 years to increase the number of affordable and accessible housing units and to contribute to the economic sustainability of communities across the state. The Division of Housing will continue to support program activities which have proven to be effective while also looking for areas where the efficiency or impact of these programs can be improved.

Specific areas where the Division of Housing has made changes have been to increase funding to the HOME-Tenant Based Rental Assistance (TBRA) program and to restructure the method of distribution of CDBG-Housing grants around a regional model. The Division's HOME-TBRA program targets individuals or families who are homeless or at risk of homelessness and have at least one household member with a disability. Clients served by the TBRA program live in non-entitlement areas of the state where it can be difficult to find affordable and accessible housing.

The CDBG-Housing program has completed its first round of funding through a new regional model of funds disbursement. The fair share regional model has improved the Division of Housing's CDBG-Housing program through both increasing administrative efficiencies and program impact. The regional model increases coordination and control at the local level and helps to ensure that funds are more evenly spread across the entire state. As the Division of Housing moves into its second round of grants under the regional model it continues to seek input on ways this model can be strengthened and improved.

Summary of citizen participation process and consultation process

The Division of Housing consulted with public and private agencies when developing Wisconsin's 2015-2019 Consolidated Plan. The Division consulted with private and public housing providers, Continua of

Care (CoC), homeless service providers, grantees, and government entities by attending conferences, conducting surveys, soliciting input via a Partner and Stakeholder Letter, and holding five public input sessions around the state as well as an online webinar.

The Division provided opportunities for the public to participate during the development of the 2015-2019 Wisconsin Consolidated Plan. The Division of Housing conducted an online public survey, solicited and accepted general public comments, attended conferences, and held five public input sessions in various locations around the state. The Division of Housing's online public survey and online webinar format ensured that both rural and urban communities, as well as those who were unable to travel to the chosen locations, had the opportunity to offer feedback.

Summary of public comments

The Division of Housing held a public hearing on January 7, 2015 and posted the Draft 2015-2019 Consolidated Plan for public comment from January 7, 2015 through February 5, 2015. This was done in accordance with the Citizen Participation Plan. The Division received 12 public comments from various advocacy groups and concerned citizens. The main topics brought up in these public comments were: Revolving Loan Funds, homeless issues, Universal Design and Visitability as they relate to persons with disabilities, fund allocation, lead paint issues, and the National Housing Trust Fund. The 12 public comments and the Division's response to each public comment can be found in Appendix D.

Summary of comments or views not accepted and the reasons for not accepting them

The 12 public comments received by the Division of Housing during the public comment period and the Division's response to each public comment can be found in Appendix D.

Summary

The Division of Housing offers a broad range of financial and technical assistance to improve and expand housing, increase affordable housing opportunities, and provide services to people without housing. The variety of federal and state programs it manages benefits persons with disabilities, low- and moderate-income residents, and homeless populations. The Division partners with local governments, homeless service providers, developers, and housing organizations throughout the state to improve housing conditions for low- to moderate-income Wisconsin residents. It distributes over \$30 million annually.

It is the Division of Housing's mission to assist Wisconsin governments, businesses, and non-profit agencies in building and sustaining quality communities. This mission is accomplished through the creation of economic opportunities, facilitation of local solutions to infrastructure issues, access to affordable housing and related services, and creation and retention of jobs.

THE PROCESS

PR-05 LEAD & RESPONSIBLE AGENCIES 24 CFR 91.300(B)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The 2015-2019 Consolidated Plan was developed by the Wisconsin Department of Administration's Division of Housing.

Agency Role	Name	Department/Agency
Lead Agency	WISCONSIN	Department of Administration, Division of Housing

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

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Introduction

The Division of Housing consulted with public and private agencies when developing Wisconsin's 2015-2019 Consolidated Plan. The Division consulted with private and public housing providers, Continua of Care (CoCs), homeless service providers, grantees, and government entities.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

Partner and Stakeholder Letter: The Division of Housing reached out to multiple different partners and/or stakeholders at the state, local, private, and nonprofit level for their input. The Division sought input on specific evidence based program modifications or new initiatives that could enable the Division to better meet the needs of Wisconsin's citizens. In addition, feedback was sought regarding the funding prioritization of local housing, community, and economic development needs.

Online Public Survey: The Division of Housing conducted an online public survey in order to gauge the needs and priorities of Wisconsin citizens. The survey was open from July 2nd –August 1st, 2014. It was taken by 655 respondents, though not every respondent answered every question. The needs and priorities outlined in the survey informed the Needs Assessment and Market Analysis, and helped the Division of Housing set appropriate goals in the Strategic Plan and Annual Action Plan. The online public survey was available in English and Spanish, the survey was also made available in other formats upon request.

A Home for Everyone Conference: The Division of Housing attended the 2014 "A Home for Everyone Conference". The conference had approximately 250 attendees and was held on July 16-17, 2014 in Pewaukee, Wisconsin. The Division of Housing held two workshop sessions in which they solicited input regarding the Consolidated Plan, they were "Impacting Local Housing Policy – Understanding the Consolidated Plan" and "What's New at Wisconsin Division of Housing". Both presentations included a detailed description of the Consolidated Plan and asked pointed questions about Wisconsin's housing, community development, and economic development needs and concerns.

Poverty Matters! Conference: The Division of Housing attended the 2014 Poverty Matters! Conference. The conference was held on September 24-25, 2014 in Appleton, WI. The Poverty Matters! Conference is committed to reducing poverty in communities in Wisconsin. The Division of Housing attended panel sessions which informed the Consolidated Plan's Needs Assessment and Market Analysis sections.

Wisconsin Public Housing Survey: The Division of Housing conducted a Public Housing Survey which was sent to 188 contacts at the 120 Wisconsin Public Housing Authorities. The survey was open from July 14th, 2014 – August 1st, 2014 and had 94 respondents (not all respondents answered every question). The Public Housing Survey was made available in other formats, or translated, upon request.

Public Input Sessions: The Division of Housing held five Public Input Sessions and an online webinar throughout the state. All locations for the Public Input Sessions had accessibility features and were open to the public. The online webinar was filmed and available on the Division of Housing's website for those who were unable to attend any of the Public Input Sessions but still wanted to provide their input.

Public Notices informing communities of the Public Input Sessions were published in the Spooner Advocate (Spooner, WI and surrounding areas), The Forest Republican (Crandon, WI and surrounding areas), Stevens Point Journal (Stevens Point, WI and surrounding areas), Wisconsin State Journal (Wisconsin), The Platteville Journal (Platteville, WI and surrounding areas). Information about the Public Input Sessions was emailed to relevant state stakeholders. Accommodations, such as example translation/interpretation services or for persons with disabilities, for the Public Input Sessions were available upon request and all Public Input Session were held at accessible venues.

- Spooner, WI
 - Location: Spooner Council Chambers, 515 N. Summit Street, Spooner, WI 54801
 - Date: August 21, 2014
- Crandon, WI
 - Location: Crandon Public Library, 110 W. Polk Street, Crandon, WI 54520
 - Date: August 22, 2014
- Stevens Point, WI
 - Location: Portage County Public Library, Pinery Room, 1001 Main Street, Stevens Point, WI 54481
 - Date: August 25, 2014
- Madison, WI + Online Webinar
 - Location: Department of Administration, St. Croix Room, 101 E Wilson Street, Madison, WI 53703
 - Date: September 10, 2014
- Platteville, WI
 - Location: City Hall, Council Chambers, 75 N. Bonson Street, Platteville, WI 53818
 - Date: September 12, 2014

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Division of Housing's Administrator and Bureau of Supportive Housing staff regularly attend Wisconsin CoC meetings and work closely with CoC staff to administer DOH programs. The Division solicited feedback specific to the 2015-2019 Consolidated Plan at the Wisconsin Balance of State CoC Quarterly Meeting held on Aug. 14-15, 2014 at the Best Western Midway Hotel in Wausau, WI. The Division of Housing distributed its online public survey to all four Continua of Care in Wisconsin and attended conferences where CoCs were in attendance, specifically "A Home for Everyone Conference" and the "Poverty Matters!" conference. Wisconsin's CoCs were asked targeted questions related to homeless service delivery in the Partner and Stakeholder Letter. Their responses informed the Homeless Needs Assessment and Market Analysis. Because service delivery structure and extent of homelessness differs in different regions of Wisconsin, the Division of Housing works with regional groupings of agencies (referred to as local continua) often while administering the ESG program.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Information regarding the Division of Housing's consultation with Wisconsin's CoCs is provided above. The Division of Housing's Administrator and ESG staff regularly attend Wisconsin CoC meetings and works closely with CoCs to administer the ESG program.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the Consultation or areas for improved coordination?
CoC - Balance of State	CoC	NA-40, MA-30	Email/Letter
CoC - Dane County	CoC	NA-40, MA-30	Email/Letter
CoC - Milwaukee County	CoC	NA-40, MA-30	Email/Letter
CoC - Racine County	CoC	NA-40, MA-30	Email/Letter
Center on Wisconsin Strategy (COWS)	University	N/A	Email/Letter
Wisconsin Department of Agriculture, Trade and Consumer Protection	Government - State	NA-50, MA-45	Email/Letter
Wisconsin Department of Child and Family Services	Government - State	NA-45, NA-40, NA-50, MA-30, MA-35, MA-45	Email/Letter
Wisconsin Department of Financial Institutions	Government - State	NA-10, MA-10-20	Email/Letter
Wisconsin Department of Health Services	Government - State	NA-10, NA -45, MA-10-20, MA-35	Email/Letter
Wisconsin Department of Natural Resources	Government - State	NA-50	Email/Letter
Wisconsin Department of Administration's Division of Intergovernmental Relations	Government - State	NA-10, NA-15-30	Email/Letter

Wisconsin Department of Corrections	Government - State	NA-40, NA-45, MA-30, MA-35	Email/Letter
Wisconsin Department of Transportation	Government - State	N/A	Email/Letter
Wisconsin Department of Public Instruction	Government - State	NA-40, MA-30	Email/Letter
Wisconsin Department of Veterans Affairs	Government - State	NA-40, MA-30	Email/Letter
Wisconsin Department of Workforce Development	Government - State	MA-45	Email/Letter
Wisconsin Economic Development Corporation	Quasi-governmental	MA-45	Email/Letter
WestCAP (West Central Wisconsin Community Action Agency), Inc.	Non-Profit	MA-45	Email/Letter
Wisconsin Housing and Economic Development Authority (WHEDA)	Quasi-governmental	MA-45	Email/Letter
Wisconsin Community Action Program Association (WISCAP)	Non-Profit	MA-45	Email/Letter
AIDS Resource Center of Wisconsin	Non-Profit	NA-45, MA-35	Email/Letter
Wisconsin Interagency Council	Government - State, CoC	NA-10, NA -45, MA-10-20, MA-35	Sought feedback at bimonthly meetings
Economic Development Corporations	Other	NA-50, MA-45	Sought feedback at Wisconsin Economic Development Corporation Regional Economic Development Summits.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

The Division of Housing consulted all relevant agencies.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Balance of State CoC 10 Year Plan – Draft	Balance of State CoC	Assist those experiencing homelessness and decrease the number of people experiencing homelessness
Madison CoC 10 Year Plan	Madison CoC	Assist those experiencing homelessness and decrease the number of people experiencing homelessness
Milwaukee CoC 10 Year Plan	Milwaukee CoC	Assist those experiencing homelessness and decrease the number of people experiencing homelessness
Racine CoC 2013 Application	Racine CoC	Assist those experiencing homelessness and decrease the number of people experiencing homelessness
Wisconsin Housing and Economic Development Authority (WHEDA) Qualified Allocation Plan (QAP)	WHEDA	Assist those in need of safe, quality, affordable rental housing in Wisconsin; Support housing goals and objectives to decrease the number of people experiencing a housing cost burden and homelessness
2014-2020 Long Range Plan for a Safe Wisconsin	Wisconsin Governor's Council on Domestic Abuse	To assist victims of domestic violence, dating violence, sexual assault, and stalking

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

The Division of Housing encouraged units of local government (UGLGs) to participate in the development of the Consolidated Plan. DOH sent email notifications to 1,900 units of local government, informing them of the online public survey and public input sessions, and encouraging them to submit feedback if they were unable to take the survey or attend the input sessions. DOH staff also solicited feedback from local government staff and local economic development corporation staff at Wisconsin Economic Development Corporation Regional Economic summits.

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The Division of Housing provided opportunities for the public to participate during the development of the 2015-2019 Wisconsin Consolidated Plan, in accordance with the current Citizen Participation Plan. The Division of Housing conducted an online public survey, solicited and accepted general public comments, attended the A Home for Everyone Conference, and held five public input sessions in various locations around the state. DOH's online survey tool and online webinar format ensured that both rural and urban communities, as well as those who were unable to travel to the chosen locations, had the opportunity to offer feedback.

Online Public Survey: The Division of Housing conducted an online public survey in order to gauge the needs and priorities of Wisconsin citizens. The survey was conducted in the summer of 2014, and was open from July 2nd –August 1st. It was taken by 655 respondents, though not every respondent answered every question. The needs and priorities outlined in the survey informed the Needs Assessment and Market Analysis, and helped the Division of Housing set appropriate goals in the Strategic Plan and Annual Action Plan. The online public survey was available in English and Spanish, and other formats upon request. The results of the survey can be found in Appendix B.

General Public Comments: The Division of Housing solicited general public comment by posting information about the 2015-2019 Consolidated Plan on the Division's website and accepting emailed comments. The Division of Housing read, responded to, and recorded every email received. To the extent possible, the Division of Housing incorporated public comments into this Consolidated Plan.

A Home for Everyone Conference: The Division of Housing attended the 2014 "A Home for Everyone Conference". The conference had approximately 250 attendees and was held on July 16-17, 2014 in Pewaukee, Wisconsin. The Division of Housing held two workshop sessions in which they solicited input regarding the Consolidated Plan, they were "Impacting Local Housing Policy – Understanding the Consolidated Plan" and "What's New at Wisconsin Division of Housing". Both presentations included a detailed description of the Consolidated Plan and asked pointed questions about Wisconsin's housing, community development, and economic development needs and concerns.

Public Input Sessions: The Division of Housing held five Public Input Sessions and an online webinar throughout the state. All locations for the Public Input Sessions had accessibility features and were open to the public. They were chosen based on their location in order to distribute input sessions spatially around Wisconsin. The online webinar was filmed and available on the Division of Housing's website for those who were unable to attend any of the Public Input Sessions but still wanted to provide their input.

Public Notices informing communities of the Public Input Sessions were published in the Spooner Advocate (Spooner, WI and surrounding areas), The Forest Republican (Crandon, WI and surrounding areas), Stevens Point Journal (Stevens Point, WI and surrounding areas), Wisconsin State Journal (Wisconsin), The Platteville Journal (Platteville, WI and surrounding areas). Information about the Public Input Sessions was emailed to state stakeholders. Accommodations, such as translation/interpretation services or for persons with disabilities, for the Public Input Sessions were available upon request and all Public Input Sessions were held at accessible venues.

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Public Comment Period: The Division of Housing held a public hearing on January 7, 2015 and posted the Draft 2015-2019 Consolidated Plan for public comment from January 7, 2015 through February 5, 2015. This was done in accordance with the Citizen Participation Plan. The Division received 12 public comments from various advocacy groups and concerned citizens. The main topics brought up in these public comments were: Revolving Loan Funds, homeless issues, Universal Design and Visitability as they relate to persons with disabilities, fund allocation, lead paint issues, and the National Housing Trust Fund. The 12 public comments and the Division's response to each public comment can be found in Appendix D.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Input Session, Spooner, WI	North West Wisconsin	5 Attendees	See Appendix	
2	Public Input Session, Crandon, WI	North East Wisconsin	2 Attendees	See Appendix	
3	Public Input Session, Stevens Point, WI	Central Wisconsin	5 Attendees	See Appendix	
4	Public Input Session + Online Webinar, Madison, WI	South East Wisconsin, Broad outreach, Wisconsin citizens	In person: 7 Attendees Online:36 Attendees	See Appendix	
5	Public Input Session, Platteville, WI	South West Wisconsin	4 Attendees	See Appendix	
6	Wisconsin Consolidated Plan Online Public Survey	Broad outreach, Wisconsin Stakeholders and Citizens	655 Respondents	See Appendix B	
7	A Home for Everyone Conference	Wisconsin Stakeholders	Approximately 250 Attendees	See Appendix	
8	General Public Comment	Wisconsin Stakeholders and Citizens	5 Emailed comments	See Appendix	

Table 4 – Citizen Participation Outreach

NEEDS ASSESSMENT

NA-05 OVERVIEW

Needs Assessment Overview

The Needs Assessment details the State of Wisconsin's needs related to affordable housing, community development, and homelessness, which include: Housing Needs Assessment, Disproportionately Greater Need, Public Housing, Homeless Needs Assessment, Non-Homeless Special Needs Assessment, and Non-Housing Community Development needs.

NA-10 Housing Needs Assessment

- The most prevalent housing problems in Wisconsin are cost burden (households paying between 30-50% of their monthly income on housing) and severe cost burden (households paying more than 50% of their monthly income on housing), which are proportionally greater in the lowest income brackets and proportionally less frequent in the higher income brackets. This indicates a need for housing affordable at the lowest income levels. As Wisconsin's population is expected to continue to grow, with a large percentage of this growth among those aged 65 and older, there is also a need for affordable, accessible housing for this increasingly elderly population.
 - Housing units are classified as having a housing problem if the unit:
 - Lacks complete kitchen facilities
 - Lacks complete plumbing facilities,
 - Is overcrowded (more than one person per room), and
 - Has a cost burden greater than 30% of the household's monthly income.
 - Housing units are classified as having a severe housing problem if the unit:
 - Lacks complete kitchen facilities
 - Lacks complete plumbing facilities
 - Is severely overcrowded (more than 1.5 person per room)
 - Has a severe cost burden greater than 50% of the household's monthly income
 - Housing cost burdens are classified as:
 - No cost burden – households paying less than 30% of their monthly income on housing
 - Cost burden – households paying between 30-50% of their monthly income on housing
 - Severe cost burden – households paying more than 50% of their monthly income on housing

NA-15 – 30: Disproportionately Greater Need

- A disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. NA-15, NA-20, NA-25, and NA-30 discuss disproportionately greater need among groups experiencing housing problems, severe housing problems, and housing cost burdens.

- Using prepopulated data from the American Community Survey, the Division of Housing found that there is a disproportionately greater need among:
 - Housing problems
 - Asian (Moderate Income, Middle Income)
 - Black/African American (Low Income)
 - Pacific Islander (Extremely Low Income)
 - Severe housing problems
 - Asian (Low Income, Moderate Income, Middle Income)
 - Pacific Islander (Extremely Low Income)
 - Housing cost burdens
 - Black/African American

NA-35: Public Housing

- In Wisconsin, the Division of Housing does not directly administer public housing funds. A survey of the 120 Public Housing Authorities in Wisconsin and Wisconsin Housing and Economic Development Authority (WHEDA), revealed that in most cases, there is a long waiting list for public housing and housing vouchers.

NA-40: Homeless Needs Assessment

- According to January 2014's Point-in-Time Count, 6,058 persons were homeless in Wisconsin at a single point in time. Approximately 11% of the homeless population in Wisconsin is people experiencing chronic homelessness. Despite national decreases in the number of people experiencing homelessness, the number of clients receiving services and shelter from HMIS participating agencies in Wisconsin has increased 13% from 2009 to 2013, from 24,294 to 27,556. Decreasing the rate of homelessness will require investment in evidence based practices aimed at housing all populations experiencing homelessness.

NA-45: Non-Homeless Special Needs Assessment

- Special needs populations in Wisconsin include: elders, frail elders, persons with disabilities, persons with substance abuse disorders, and victims of domestic violence. When discussing special needs populations it must be recognized that people with disabilities have less access to resources as they are more likely to be un- or underemployed, that people living in poverty tend to have a higher incidence of disability, and that elderly populations are more prone to disability as prevalence of disability increases with age. For special needs populations, there is a need for housing, accessibility improvements that allow aging in place, supportive housing, and programs tailored to helping special needs populations stay in housing.

NA-50: Non-Housing Community Development Needs

- As identified through an online public survey conducted by the Division of Housing to gather feedback, the top five perceived needs of community development projects are:
 1. To fund community development planning efforts that spur new investment
 2. To address public infrastructure deficiencies such as storm sewers or streets
 3. To assist in building or rehab of fire stations, libraries, or other public facilities
 4. To support energy efficient design and retrofitting in public facilities
 5. To fund accessibility modifications such as wheelchair ramps in public facilities

Summary of Housing Needs

The largest housing problems experienced in Wisconsin are housing cost burden and severe housing cost burden. This problem is persistent both in Wisconsin and nationally, with a Joint Center for Housing Studies report finding that half of U.S. renters are experiencing a housing cost burden. This issue is most severe at the lowest end of the income spectrum, with the vast majority of extremely low income Wisconsinites facing a cost burden or severe cost burden.

It is necessary to identify the types of housing problems being faced by low-income Wisconsin households to determine how many of them are in need of housing assistance. Data contained in this section's tables was prepopulated by HUD using 2007-2011 American Community Survey and HUD Comprehensive Housing Affordability Strategy tables. The tables included in this section have a number of terms, which are discussed below.

Housing units are classified as having a housing problem if the unit:

- lacks complete kitchen facilities
- lacks complete plumbing facilities
- is overcrowded (more than one person per room)
- has a cost burden greater than 30% of the household's monthly income

Housing units are classified as having a severe housing problem if the unit:

- lacks complete kitchen facilities
- lacks complete plumbing facilities
- is overcrowded (more than 1.5 person per room)
- has a severe cost burden greater than 50% of the household's monthly income

Households are analyzed by housing problem within a particular income range. The five income ranges used are:

- extremely low income households (0-30% of area median income)
- low income households (30-50% of area median income)
- moderate income households (50-80% of area median income)
- middle income households (80-100% of area median income)
- upper income households (>100% of area median income)

The following table shows population, household, and median income estimates for Wisconsin using 2007-2011 ACS data. Wisconsin's population has increased by 6% between 2000 and 2011. According to projections prepared by DOA and the University of Wisconsin Applied Population Lab, Wisconsin's population is expected to grow 5.6% between 2010 and 2020. A large percentage of this growth will occur among those aged 65 and older, due to the aging of the baby boomer generation and increases in life expectancy.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	5,363,675	5,664,893	6%
Households	2,086,304	2,279,738	9%
Median Income	\$43,791.00	\$52,374.00	20%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

The following table shows the total number of households in Wisconsin, broken up by income and type of household. Small family households have 2-4 members and large family households have 5 or more members. It is important to note that "Total Households" is the total number of household at that income level, but is *not* the sum of the household types listed below it. A household may have characteristics captured in multiple categories, or may not be captured by any of the categories.

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	251,855	267,435	401,690	253,120	1,105,640
Small Family Households *	67,090	71,305	130,545	101,030	638,565
Large Family Households *	13,865	16,905	29,015	21,290	85,805
Household contains at least one person 62-74 years of age	32,690	47,095	77,175	47,615	173,475
Household contains at least one person age 75 or older	45,035	67,515	64,550	25,405	61,480
Households with one or more children 6 years old or younger *	41,465	40,380	63,095	41,350	114,005
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Housing Needs Summary Tables

The following table shows the number of households with different types of housing problems, broken up by tenure (renter or owner) and income level. Housing problems are concentrated at lower income levels. In some cases, there are numerically more households with housing problems at higher income levels, but the percentage of households with a housing cost burden remains highest for low income households. For example, there is a greater quantity of housing cost burdens among owner households of high income limits however housing cost burdens are experienced at a greater ratio among owner households in low income limits.

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	4,755	3,400	2,215	970	11,340	1,730	1,575	1,680	750	5,735
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,660	1,445	1,140	415	4,660	120	445	565	280	1,410
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	4,360	4,375	3,920	1,245	13,900	900	1,840	3,430	1,910	8,080
Housing cost burden greater than 50% of income (and none of the above problems)	109,625	30,510	4,270	260	144,665	50,555	39,810	34,840	9,805	135,010
Housing cost burden greater than 30% of income (and none of the above problems)	21,140	68,810	43,725	4,650	138,325	12,550	39,445	71,940	49,125	173,060
Zero/negative Income (and none of the above problems)	9,995	0	0	0	9,995	6,505	0	0	0	6,505

Table 7 – Housing Problems Table

Data Source: 2007-2011 CHAS

The following table summarizes households experiencing severe housing problems, broken down by income limits. Households are grouped based on whether or not they are experiencing a severe housing problem.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: lacks complete kitchen facilities, lacks complete plumbing facilities, is overcrowded (more than 1.5 person per room), has a severe cost burden greater than 50% of the household's monthly income)

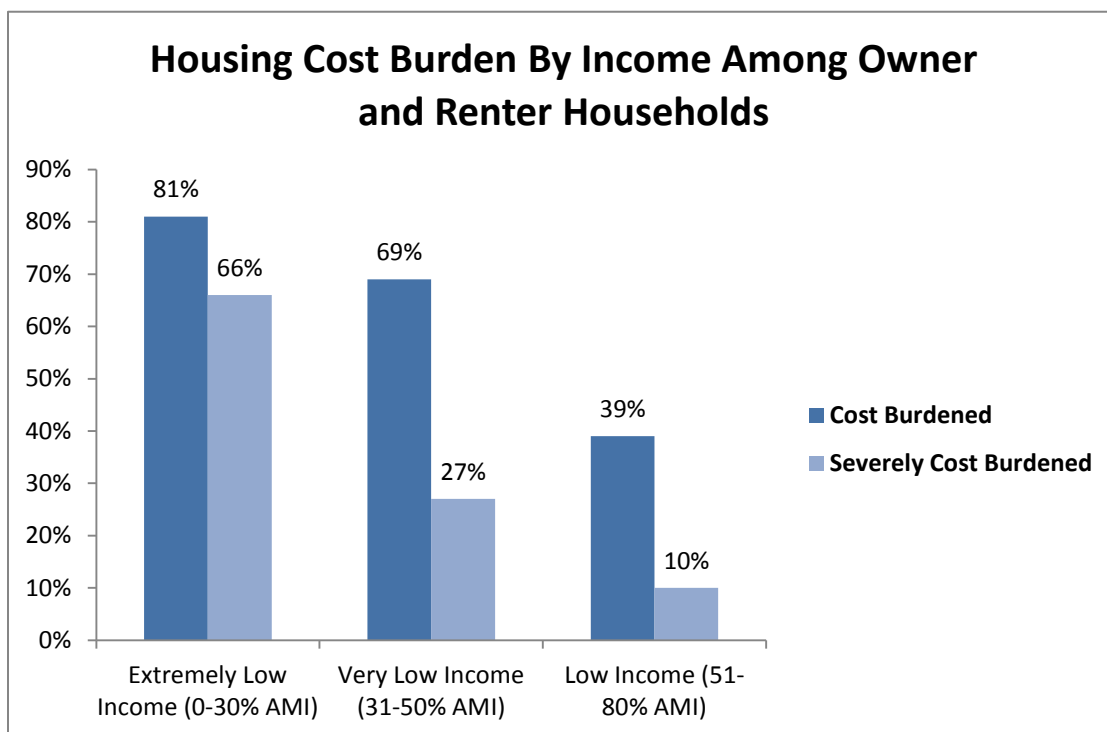
	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	120,400	39,730	11,545	2,895	174,570	53,310	43,675	40,510	12,745	150,240
Having none of four housing problems	44,310	103,595	152,485	71,155	371,545	17,340	80,435	197,150	166,320	461,245
Household has negative income, but none of the other housing problems	9,995	0	0	0	9,995	6,505	0	0	0	6,505

Table 8 – Housing Problems 2

Data 2007-2011 CHAS
Source:

Figure 1: Housing Cost Burden By Income Among Owner and Renter Households

The following chart was created by the Division of Housing using 2006-2010 Comprehensive Housing Affordability Strategy Data. It illustrates the percentage of cost burdened and severely cost burdened households by income category. 81% of extremely low income households are cost burdened, and 66% of extremely low income households are severely cost burdened. The percentage of cost burdened households is lower among very low income and low income households. This data indicated that there is a shortage of housing affordable to households earning less than 80% of AMI. This shortage of affordable housing is the most severe at the lowest income levels.



The following table shows cost burdened households by tenure, income level, and household type. Housing problems are concentrated at lower income levels. Among owner households of certain types, there are numerically more households with housing problems at higher income levels, but the *percentage* of households with a housing cost burden remains highest in the lowest income categories.

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	44,455	33,395	14,965	92,815	13,870	21,710	44,595	80,175
Large Related	8,525	5,910	1,815	16,250	4,080	6,660	12,335	23,075
Elderly	24,050	26,400	12,590	63,040	32,195	39,750	27,975	99,920
Other	62,650	39,230	19,825	121,705	15,055	13,445	24,445	52,945
Total need by income	139,680	104,935	49,195	293,810	65,200	81,565	109,350	256,115

Table 9 – Cost Burden > 30%

Data 2007-2011 CHAS
Source:

The following table shows households experiencing a severe housing cost burden by tenure, income level, and household type. Severe cost burden is overwhelmingly concentrated among extremely low income renters.

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	38,055	8,590	685	47,330	12,515	13,975	14,615	41,105
Large Related	7,260	1,345	65	8,670	3,490	3,900	3,025	10,415
Elderly	17,815	11,440	2,610	31,865	22,995	13,965	9,365	46,325
Other	53,670	10,935	1,215	65,820	13,190	9,015	8,385	30,590
Total need by income	116,800	32,310	4,575	153,685	52,190	40,855	35,390	128,435

Table 10 – Cost Burden > 50%

Data 2007-2011 CHAS
Source:

The following table shows overcrowded households by tenure, income level, and housing type. The majority of overcrowding occurs in single family households. This indicates that families, as opposed to a single person or a couple, may have more trouble finding an affordable unit with enough bedrooms.

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	5,050	4,875	4,270	1,250	15,445	1,135	2,065	3,625	1,800	8,625
Multiple, unrelated family households	480	670	540	280	1,970	155	435	545	410	1,545
Other, non-family households	580	415	340	180	1,515	4	59	15	29	107
Total need by income	6,110	5,960	5,150	1,710	18,930	1,294	2,559	4,185	2,239	10,277

Table 11 – Crowding Information – 1/2

Data 2007-2011 CHAS
Source:

Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in Wisconsin to meet housing, business, and infrastructure needs caused by the disasters. The Division of Housing estimates that 20 housing units are still in need of repair, restoration, or mitigation activities.

Describe the number and type of single person households in need of housing assistance.

No comprehensive statewide estimate is available for the housing needs of single person households. Data describing those the number of households experiencing housing problems can be found above and data describing the number of individuals experiencing homelessness can be found in NA-40.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

No comprehensive statewide estimate is available for the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking. Substitute data and a further discussion of the needs of these population types can be found in NA-45.

What are the most common housing problems?

The most common housing problems experienced by both owners and renters are cost burden and severe cost burden. These problems are most prevalent among extremely low income households, with 81% of the 248,665 extremely low income households experiencing a cost burden and 66% experiencing a severe cost burden. Very low income households also experience housing cost burdens at high rates, with 69% of very low income households experiencing a cost burden and 27% experiencing a severe cost burden. Households paying over 30% of their income on housing costs may not have enough income left to cover other basic needs, such as food, transportation, and healthcare. This problem was emphasized by housing providers during DOH public input sessions. Providers were concerned that the combination of low incomes and high housing costs is making it difficult for low income Wisconsinites to stay stably housed while meeting basic needs.

Are any populations/household types more affected than others by these problems?

Extremely low income households are disproportionately affected by all housing problems. A higher percentage of this income group experiences a cost burden and severe cost burden (described above), as well as overcrowding, severe overcrowding, and a lack of complete kitchen and plumbing facilities.

Incomes below 30% of area median income are often insufficient to afford safe and sanitary housing without assistance.

Families experienced cost burden and severe cost burden at higher levels than average in every income group. Once again, these problems are the most prevalent among extremely low income families, with 87% of extremely low income small families and 90% of extremely low income large families experiencing a cost burden. Three quarters of very low income families are experiencing a housing cost burden. Among low income families, approximately half of large families are experiencing a cost burden. Families have a more difficult time finding housing because of a shortage of affordable rental properties with enough bedrooms to accommodate a larger household size. Feedback received during public input sessions and the online public survey show that the need for units with three or more bedrooms is experienced in both urban and rural areas of the state. Further data describing this need can be found in MA-10.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Low income households at risk of homelessness are often experiencing both a housing cost burden and co-occurring issues that make it difficult to maintain housing stability. Individuals and families at risk of homelessness often lack a stable source of income or have recently suffered a loss of income. Issues such as a lack of transportation to and from work (especially in rural areas) and a lack of child care make it difficult to maintain a job. In some circumstances, those at risk of homelessness have mental illnesses or other disabilities that make it difficult to find both employment and safe, accessible, and affordable housing.

Families nearing the end of rapid re-housing assistance need sufficient income in order to afford rent after the rental subsidies end. It is not always possible to find income due to long waits for Social Security Income approvals, struggles with finding better-paying jobs, and living dependent on temporary assistance to needy families. In addition, homeless providers have expressed that the loss of case management services experienced at the same time as the loss of rental subsidy can cause some families to struggle with financial management and day to day activities. Providers continue to focus on finding income for families during the program so that they can maintain housing stability after its end.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Division of Housing, particularly in its homeless prevention programs, uses the HUD Category 3 definition of homelessness to define those at risk of homelessness. The HUD Category 3 definition includes people who will imminently lose their primary residency within 14 days and lack the resources or support networks to remain in housing.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Low incomes and a lack of affordable housing often combine to create housing instability for individuals and families. However, it is important to note that the majority of low income families never experience homelessness. Those who do experience homelessness have often just experienced a sudden loss of income, unexpected large household or medical expenses, or an eviction. They also tend to have higher rates of mental illness and alcohol and substance abuse.

If a household has experienced an eviction, doesn't have a stable source of income, or has poor credit, they may have a difficult time finding a landlord willing to rent to them. This can create a cycle of housing instability where the household, even once co-occurring issues are stabilized, still cannot find housing.

Discussion

Prepopulated Comprehensive Housing Affordability Strategy data makes it clear that the largest housing issues for both owners and renters are housing cost burden and severe housing cost burden. Related issues such as a lack of stable income, a lack of reliable transportation, and mental health issues can make it even more difficult for households to maintain stable housing. Many of the low income households experiencing housing cost burdens do not have the ability to cover their basic needs, and do not have savings to pay for an unexpected expense. It is important to focus resources on increasing the amount of affordable housing in Wisconsin, due to the shortage described by housing providers and seen in the data. The greatest need exists at the very lowest income levels. In order to attain housing affordable to extremely low income households, deep subsidies are needed. In addition, housing providers should focus on keeping individuals and families housed, in order to avoid the issues caused by a poor rental history.

Another common housing problem is the lack of rural farm worker housing. According to United Migrant Opportunity Services (UMOS) and Wisconsin Community Action Program (WISCAP), there is a need to develop more farm worker housing, both temporary and permanent, in Wisconsin. Farm workers, agriculture workers, or Spanish speaking populations are populations in particular need of housing assistance, especially in rural areas in Wisconsin. Due to their precarious economic position (low earnings), migrant farmworkers often need assistance for a number of basic needs, including housing. Financing and maintaining farm worker housing can be more challenging than financing and maintaining affordable housing as occupancy is not necessarily year round.

NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS - 91.305 (B)(2)

Introduction

The following analysis presents data on the number of households with housing problems in the State of Wisconsin and on the proportion of housing problems occurring among particular racial or ethnic groups. According to HUD's definition, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole (including all racial or ethnic groups). Households that have an income greater than the area median income (AMI) are not included in this analysis.

Note: The figures for the first three columns (A-C) in the tables of this section (NA-15) were provided by HUD. The figures for the other columns (D-F) were created by DOH following HUD's formula for calculating disproportionately greater need. The data provided by HUD are rounded figures from the Census Bureau's American Community Survey. A HUD example for calculating disproportionately greater need can be found at the following link:

<https://www.onecpd.info/onecpd/assets/File/DisproportionatelyGreaterNeedCalculation.pdf>

Groups with Disproportionately Greater Needs among Extremely Low Income Households (0-30% of Area Median Income)

Housing Problems	A Has one or more of four housing problems	B Has none of the four housing problems	C Household has no/negative income, but none of the other housing problems	D Total HH in this category (A+B+C)	E % HH with housing problems (A÷D)	F % Difference from jurisdiction as a whole
Jurisdiction as a whole	213,972	33,775	13,862	261,609	81.8%	n/a
White	160,904	27,391	9,238	197,533	81.5%	-0.3%
Black / African American	31,090	3,621	2,188	36,899	84.3%	2.5%
Asian	4,109	413	1,048	5,570	73.8%	-8.0%
American Indian, Alaska Native	2,768	921	280	3,969	69.7%	-12.1%
Pacific Islander	64	0	0	64	100.0%	18.2%
Hispanic	12,594	1,021	922	14,537	86.6%	4.8%

Table 1 - Disproportionately Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

The table above shows that among extremely low income households (0-30% area median income), 81.8% have one or more housing problems. There is a disproportionately greater need among extremely low income Pacific Islander households. The rate of housing problems among extremely low income Pacific Islander households is 100%, which is 18.2% greater than the jurisdiction as a whole. However, it should be noted that the total number of Pacific Islanders households within the 0-30% AMI income range is very small, being estimated at only 64 households. Pacific Islanders thus make up only .03% of all extremely low income households with housing problems in Wisconsin.

Groups with Disproportionately Greater Needs among Low Income Households (30-50% of Area Median Income)

	A	B	C	D	E	F
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	181,250	86,147	0	267,397	67.8%	n/a
White	148,186	75,587	0	223,773	66.2%	-1.6%
Black / African American	16,137	4,292	0	20,429	79.0%	11.2%
Asian	2,694	1,057	0	3,751	71.8%	4.0%
American Indian, Alaska Native	1,266	955	0	2,221	57.0%	-10.8%
Pacific Islander	15	75	0	90	16.7%	-51.1%
Hispanic	11,072	3,690	0	14,762	75.0%	7.2%

Table 12 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

The table above shows that among low income households (30-50% area median income) in Wisconsin, 67.8% have one or more housing problems. There is a disproportionately greater need among low income Black/ African American households. The rate of housing problems among these Black/ African American households is 79.0%, which is 11.2% greater than the jurisdiction as a whole.

Groups with Disproportionately Greater Needs among Moderate Income Households (50-80% of Area Median Income)

	A	B	C	D	E	F
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	160,525	254,533	0	415,058	38.7%	n/a
White	138,729	224,342	0	363,071	38.2%	-0.5%
Black / African American	9,464	12,513	0	21,977	43.1%	4.4%
Asian	3,002	2,809	0	5,811	51.7%	13.0%
American Indian, Alaska Native	994	2,259	0	3,253	30.6%	-8.1%
Pacific Islander	4	54	0	58	6.9%	-31.8%
Hispanic	7,131	10,526	0	17,657	40.4%	1.7%

Table 13 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

The table above shows that among moderate income households (50-80% area median income) in Wisconsin, 38.7% have one or more housing problems. There is a disproportionately greater need among moderate income Asian households. The rate of housing problems among these Asian households is 51.7%, which is 13.0% greater than the jurisdiction as a whole.

Groups with Disproportionately Greater Needs among Middle Income Households (80-100% of Area Median Income)

	A	B	C	D	E	F
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	65,705	200,240	0	265,945	24.7%	n/a
White	59,177	181,022	0	240,199	24.6%	-0.1%
Black / African American	2,182	7,530	0	9,712	22.5%	-2.2%
Asian	1,234	2,085	0	3,319	37.2%	12.5%
American Indian, Alaska Native	499	1,781	0	2,280	21.9%	-2.8%
Pacific Islander	4	14	0	18	22.2%	-2.5%
Hispanic	2,222	6,735	0	8,957	24.8%	0.1%

Table 14 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 CHAS

The table above shows that among middle income households (80-100% area median income) in the State of Wisconsin, 24.7% have one or more housing problems. There is a disproportionately greater need among middle income Asian households. The rate of housing problems among these Asian households is 37.2%, which is 12.5% greater than the jurisdiction as a whole.

Discussion

Below is a summary of racial or ethnic groups within the State of Wisconsin with disproportionately greater housing problems:

Among Extremely Low Income Households (0-30% AMI):

- Pacific Islanders have housing problems at a rate that is 18.2% greater than extremely low income households as a whole. Pacific Islanders make up an estimated 0.03% of all extremely low income households with housing problems in Wisconsin.

Among Low Income Households (30-50% AMI):

- Black/ African Americans have housing problems at a rate that is 11.2% greater than low income households as a whole. Black/ African Americans make up an estimated 8.9% of all low income households with housing problems in Wisconsin.

Among Moderate Income Households (50-80% AMI):

- Asians have housing problems at a rate that is 13.0% greater than moderate income households as a whole. Asians make up an estimated 1.9% of all moderate income households with housing problems in Wisconsin.

Among Middle Income Households (80-100% AMI):

- Asians have housing problems at a rate that is 12.5% greater than middle income households as a whole. Asians make up an estimated 1.9% of all middle income households with housing problems in Wisconsin.

NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.305(B)(2)

Introduction

The following analysis presents data on the number of households with severe housing problems in the State of Wisconsin, and on the proportion of severe housing problems occurring among particular racial or ethnic groups. According to HUD's definition, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Households which have an income greater than the area median income for Wisconsin are not included in this needs analysis of severe housing problems.

Note: The figures for the first three columns (A-C) in the tables of this section (NA-20) were provided by HUD. The figures for the other columns (D-F) were calculated by DOH. The data provided by HUD are rounded figures from the Census Bureau's American Community Survey.

Extremely Low Income Households (0-30% of Area Median Income)

	A	B	C	D	E	F
Housing Problems: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden greater than 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	171,322	76,453	13,862	261,637	65.5%	n/a
White	127,207	61,118	9,238	197,563	64.4%	-1.1%
Black / African American	26,304	8,422	2,188	36,914	71.3%	5.8%
Asian	3,591	936	1,048	5,575	64.4%	-1.1%
American Indian, Alaska Native	1,974	1709	280	3,963	49.8%	-15.7%
Pacific Islander	64	0	0	64	100.0%	34.5%
Hispanic	10,221	3,381	922	14,524	70.4%	4.9%

Table 15 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

The table above shows that among extremely low income households (0-30% area median income) in the State of Wisconsin, 65.5% have one or more severe housing problems. There is a disproportionately greater need among extremely low income Pacific Islander households. The rate of severe housing

problems among these Pacific Islander households is 100%, which is 34.5% greater than the jurisdiction as a whole. However, it should be noted that the total number of Pacific Islanders households within the 0-30% AMI income range is very small, being estimated at only 64 households. Pacific Islanders make up only .04% of all extremely low income households with severe housing problems in Wisconsin.

Low Income Households (30-50% of Area Median Income)

	A	B	C	D	E	F
Housing Problems: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden greater than 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	72,126	195,085	0	267,211	27.0%	n/a
White	58,371	165,409	0	223,780	26.1%	-0.9%
Black / African American	6,170	14,268	0	20,438	30.2%	3.2%
Asian	1,481	2,244	0	3,725	39.8%	12.8%
American Indian, Alaska Native	385	1836	0	2,221	17.3%	-9.7%
Pacific Islander	15	75	0	90	16.7%	-10.3%
Hispanic	5,185	9,540	0	14,725	35.2%	8.2%

Table 16 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

The table above shows that among low income households (30%-50% area median income) in the State of Wisconsin, 27.0% have one or more severe housing problems. There is a disproportionately greater need among low income Asian households. The rate of housing problems among these Asian households is 39.8%, which is 12.8% greater than the jurisdiction as a whole.

Moderate Income Households (50-80% of Area Median Income)

	A	B	C	D	E	F
Housing Problems: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden greater than 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	46,222	368,868	0	415,090	11.1%	n/a
White	38,266	324,716	0	362,982	10.5%	-0.6%
Black / African American	2,487	19,484	0	21,971	11.3%	0.2%
Asian	1,869	3,958	0	5,827	32.1%	20.9%
American Indian, Alaska Native	271	2,963	0	3,234	8.4%	-2.8%
Pacific Islander	4	54	0	58	6.9%	-4.2%
Hispanic	2,953	14,703	0	17,656	16.7%	5.6%

Table 17 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

The table above shows that among moderate income households (50-80% area median income) in the Wisconsin, 11.1% have one or more severe housing problems. There is a disproportionately greater need among moderate income Asian households. The rate of housing problems among these Asian households is 32.1%, which is 20.9% greater than the jurisdiction as a whole.

Middle Income Households (80-100% of Area Median Income)

	A	B	C	D	E	F
Housing Problems: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden greater than 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total HH in this category (A+B+C)	% HH with housing problems (A÷D)	% Difference from jurisdiction as a whole
Jurisdiction as a whole	13,517	252,782	0	266,299	5.1%	n/a
White	11,235	229,287	0	240,522	4.7%	-0.4%
Black / African American	586	9,141	0	9,727	6.0%	0.9%
Asian	704	2,607	0	3,311	21.3%	16.2%
American Indian, Alaska Native	253	2,031	0	2,284	11.1%	6.0%
Pacific Islander	0	18	0	18	0.0%	-5.1%
Hispanic	682	8,277	0	8,959	7.6%	2.5%

Table 18 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

The table above shows that among middle income households (80-100% area median income) in the State of Wisconsin, 5.1% have one or more severe housing problems. There is a disproportionately greater need among middle income Asian households. The rate of housing problems among these Asian households is 21.3%, which is 16.2% greater than the jurisdiction as a whole.

Discussion

Below is a summary of racial or ethnic groups within the State of Wisconsin with disproportionately greater severe housing problems:

Among Extremely Low Income Households (0-30% AMI):

- Pacific Islanders have severe housing problems at a rate that is 34.5% greater than extremely low income households as a whole. Pacific Islanders make up an estimated 0.04% of all extremely low income households with severe housing problems in Wisconsin.

Among Low Income Households (30-50% AMI):

- Asians have severe housing problems at a rate that is 12.8% greater than low income households as a whole. Asians make up an estimated 2.1% of all low income households with severe housing problems in Wisconsin.

Among Moderate Income Households (50-80% AMI):

- Asians have severe housing problems at a rate that is 20.9% greater than moderate income households as a whole. Asians make up an estimated 4.0% of all moderate income households with severe housing problems in Wisconsin.

Among Middle Income Households (80-100% AMI):

- Asians have severe housing problems at a rate that is 16.2% greater than middle income households as a whole. Asians make up an estimated 5.2% of all middle income households with severe housing problems in Wisconsin.

NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.305 (B)(2)

Introduction

The following analysis presents data on the number of households with cost burdens in the State of Wisconsin and on the proportion of households with cost burdens occurring among particular racial or ethnic groups. According to HUD's definition, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Cost burden is classified as follows:

- No Cost Burden: Households paying less than 30% of monthly income for housing
- Cost Burden: Households paying between 30-50% of monthly income for housing
- Severe Cost Burden: Households paying above 50% of monthly income for housing

Note: The figures for the first four columns (A-D) in the table 8 were provided by HUD. The figures for column E of table 8 and the following tables 9 and 10 were calculated by DOH. The data provided by HUD are rounded figures from the Census Bureau's American Community Survey.

Count of Households with Cost Burden by Race / Ethnicity

	A	B	C	D	E
Housing Cost Burden	No Cost Burden (<=30%)	Cost Burden (30-50%)	Severe Cost Burden (>50%)	No / negative income (not computed)	Total HHs (A+B+C+D)
Jurisdiction as a whole	1,538,556	413,819	281,849	14,611	2,248,835
White	1,408,569	357,398	224,535	9,685	2,000,187
Black / African American	48,383	26,356	32,652	2,268	109,659
Asian	20,297	5,214	4,923	1,132	31,566
American Indian, Alaska Native	10,983	3,052	2,199	300	16,534
Pacific Islander	360	23	64	0	447
Hispanic	40,908	17,289	13,919	1,045	73,161

Table 19 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Percentage of Households with Cost Burden by Race / Ethnicity

Housing Cost Burden (30-50%)	% HH with cost burden	% Difference compared to jurisdiction as a whole
Jurisdiction as a whole	18.40%	n/a
White	17.90%	-0.50%
Black / African American	24.00%	5.60%
Asian	16.50%	-1.90%
American Indian, Alaska Native	18.50%	0.10%
Pacific Islander	5.10%	-13.30%
Hispanic	23.60%	5.20%

Table 9 – Greater Need: Housing Cost Burdens AMI

Percentage of Households with Severe Cost Burden by Race / Ethnicity

Severe Housing Cost Burden (>50%)	% HH with cost burden	% Difference compared to jurisdiction as a whole
Jurisdiction as a whole	12.50%	n/a
White	11.20%	-1.30%
Black / African American	29.80%	17.20%
Asian	15.60%	3.10%
American Indian, Alaska Native	13.30%	0.80%
Pacific Islander	14.30%	1.80%
Hispanic	19.00%	6.50%

Table 10 – Greater Need: Housing Cost Burdens AMI

Table 9 depicts cost burdened (30-50% of income) households by racial or ethnic groups; it shows that no group in Wisconsin experiences a disproportionately greater need. When examining severely cost burdened households in Table 10 there is a disproportionate need among Black/ African American households. The percentage of households with a severe cost burden across Wisconsin is 12.5%, but among Black/ African Americans it is 29.8%. The rate of severe cost burden is then 17.2% greater among Black/ African Americans.

Discussion

NA-30 DISPROPORTIONATELY GREATER NEED: DISCUSSION – 91.305 (B)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

This section summarizes, by racial and ethnic group, disproportionately greater housing need identified in the previous sections. Below is a summary table displaying where disproportionately greater housing problems have been found among particular racial or ethnic groups within a given income range. The rate of housing problems and severe housing problems for all households in the State of Wisconsin is listed in the top row, highlighted in orange, with the total number of households given in parentheses. Each subsequent row details a racial or ethnic group and gives the percentage point increase or decrease from the jurisdiction's total percentage of housing problems, as well as the total number of households listed in parentheses. For example, in the State of Wisconsin, 81.8% of extremely low income households (0-30% AMI) have housing problems, but extremely low income Pacific Islander households experience housing problems at a rate of 18.2% greater than the State of Wisconsin's extremely low income households. However it should be noted that the total number of extremely low income Pacific Islander households with housing problems is 64 whereas the total number of extremely low income households in the State of Wisconsin is 213,972.

Disproportionately Greater Need by Racial or Ethnic Group

	Extremely Low Income 0-30% AMI		Low Income 30-50% AMI		Moderate Income 50-80% AMI		Middle Income 80-100% AMI	
	Housing Problems	Severe Housing Problems	Housing Problems	Severe Housing Problems	Housing Problems	Severe Housing Problems	Housing Problems	Severe Housing Problems
State of Wisconsin	81.8% (213,972)	65.5% (171,322)	67.8% (181,250)	27.0% (72,126)	38.7% (160,525)	11.1% (46,222)	24.7% (65,705)	5.1% (13,517)
White	-0.3% (160,904)	-1.1% (127,207)	-1.6% (148,186)	-0.9% (58,371)	-0.5% (138,729)	-0.6% (38,266)	-0.1% (59,177)	-0.4% (11,235)
Black/ African American	+2.5% (31,090)	+5.8% (26,304)	+11.2% (16,137)	+3.2% (6,170)	+4.4% (9,464)	+0.2% (2,487)	-2.2% (2,182)	+0.9% (586)
Asian	-8.0% (4,109)	-1.1% (3,591)	+4.0% (2,694)	+12.8% (1,481)	+13% (3,002)	+20.9% (1,869)	+12.5% (1,234)	+16.2% (704)
American Indian, Alaska Native	-12.1% (2,768)	-15.7% (1,974)	-10.8% (1,266)	-9.7% (385)	-8.1% (994)	-2.8% (271)	-2.8% (499)	+6% (253)
Pacific Islander	+18.2% (64)	+34.5% (64)	-51.1% (15)	-10.3% (15)	-31.8% (4)	-4.2% (4)	-2.5% (4)	-5.1% (0)
Hispanic	+4.8% (12,594)	+4.9% (10,221)	+7.2% (11,072)	+8.2% (5,185)	+1.7% (7,131)	+5.6% (2,953)	+0.1% (2,222)	+2.5% (682)

Note: Racial or ethnic groups with findings of disproportionately greater housing needs than the State of Wisconsin population at given income range displayed in red.

White Households

Based on this census data there are no findings of disproportionately greater housing among white households.

Black/ African American Households

There is a disproportionately greater housing need for low income (30-50% AMI) Black/ African American households. The rate of housing problems among all low income households is 67.8%. For Black/ African Americans, the rate is 79.0% or 11.2% greater than the population as a whole.

However, when the criteria is raised from housing problems to severe housing problems for low income Black/ African American households there is no longer a finding of disproportionately greater need. Housing problems among low income Black/ African American households are 11.2% higher than that of all low income households in Wisconsin, while severe housing problems are only 3.2% higher among Black/ African American households.

As illustrated in NA-25, an analysis of severe housing cost burden (>50% of monthly income) shows that there is a disproportionately greater need among Black/ African American households. While only 12.5% of all Wisconsin households are severely cost burdened, 29.8% of Black/African American households

have a severe cost burden in housing. This rate of severe cost burden is 17.2% higher than for the population as a whole.

Black/ African American households clearly have a disproportionately greater need for housing than the rest of the population, but this need is not consistent among specific income ranges and/or for specific types of problems. This does not necessarily reflect a persistent level of disproportionately greater need for all Black/ African American households across all types of housing problems.

Data describing the housing needs of Black/ African American households includes all households in both CDBG entitlement and non-entitlement areas. Black/ African Americans are the largest minority racial or ethnic group, comprising 6.12% of Wisconsin's population. The racial composition of the population in the non-entitlement areas (i.e. the rural areas and small cities served by DOH's CDBG program) is only 0.88% Black/ African American. Because Black/ African American households are congregated in larger urban areas, the findings of disproportionately greater housing needs are likely largely a reflection of the condition in the entitlement areas. There is currently no data available on housing problems by racial or ethnic groups looking just at the non-entitlement areas.

Asian Households

Asian households have the greatest number of findings of disproportionately greater housing need across the widest income range, but it should be noted that there was no finding of disproportionately greater need among extremely low income Asian households. Severe housing problems among low income Asian households are 12.8% greater than the percentage of housing problems among the population of Wisconsin as whole. Among moderate income Asian households housing problems were 13.0% greater and severe housing problems were 20.9% greater. Among moderate income Asian households housing problems were 12.5% greater and severe housing problems were 16.2% greater.

There is no finding of disproportionately greater need when examining the percentage of cost burdened and severely cost burdened Asian households (across all income ranges).

While it is not possible to tell the exact nature of the housing needs among Asian households, several observations can be made. If the disproportionately greater housing need among Asian households was an issue of substandard housing (lack of kitchen or plumbing facilities) we would expect to see this need mostly showing up for households on the lower end of the income range. Instead, data indicates that the most consistent findings of disproportionately greater housing need occur at the higher income range. If the issue of housing need was one of cost burden, we would expect to see a finding of disproportionately greater cost burden among Asian households across all income ranges. However, there is no finding of disproportionately greater cost burden or severe cost burden among these households (see section NA-25). A possible explanation of the data is that the disproportionately greater housing need among Asian households arises from overcrowding (>1 person per room) and severe overcrowding (>1.5 persons per room). It is possible that a higher percentage of Asian households tend to be overcrowded even at moderate and middle income ranges than the population as a whole.

Overcrowding (>1 person per room) by Racial and Ethnic Groups

Overcrowded units (>1 persons per room)	White	Black/ African American	Hispanic / Latino	Asian	American Indian /Alaska Native	Hawaiian / Other Pacific Islander	Two or More Races	Some Other Race
Total units	2,057,533	122,291	86,778	37,395	18,184	n/a	23,246	23,416
Overcrowded units	25,836	5,088	9,265	4,239	597	n/a	1,221	2,341
% Overcrowded	1.3%	4.2%	10.7%	11.3%	3.3%	n/a	5.3%	10.0%

Data Source: 2010-12 ACS

Though overcrowding among racial and ethnic groups is highest for Asian households at 11.3%, this is a decrease from the 2005-07 American Community Survey when overcrowding among Asian households was 12.6%, and from the 2000 census when it was 27.1%.

American Indian, Alaska Native Households

There are no findings of disproportionately greater housing need from the HUD provided Comprehensive Housing Affordability Study data for American Indian, Alaska Native households. In fact American Indian, Alaska Natives have some of the lowest percentage of households with housing problems out of all racial and ethnic groups.

Pacific Islander Households

The percentage of extremely low income Pacific Islander households with housing problems is disproportionately greater (18.2%) than that of all extremely low income households. The percentage of households with severe housing problems, among extremely low income Pacific Islanders, is 34.5%. However, it must be noted that the total number of Pacific Islander households is extremely small. There are only 64 extremely low income Pacific Islander households in all of Wisconsin, all of which are identified as having housing problems making the housing need for this subgroup 100%.

Hispanic Households

There are no findings of disproportionately greater housing need among Hispanic households for the State of Wisconsin. This is particularly important for this Consolidated Plan because in the non-entitlement portion of the State of Wisconsin (which excludes Dane, Milwaukee and Waukesha counties along with communities with populations over 50,000) the largest racial or ethnic minority are persons of Hispanic origin at 2.77%.

Wisconsin Population by Race for Non-entitlement Area (CDBG Grantee)

Race	Number	Percentage
White alone (not Hispanic)	2,820,173	93.26%
Black or African American alone (not Hispanic)	26,728	0.88%
American Indian and Alaska Native alone (not Hispanic)	31,439	1.04%
Asian alone (not Hispanic)	31,475	1.04%
Native Hawaiian and Other Pacific Islander alone (not Hispanic)	695	0.02%
Some other race alone (not Hispanic)	1,730	0.06%
Two or more races (not Hispanic)	28,017	0.93%
Persons of Hispanic Origin	83,725	2.77%
Total	3,023,982	

2007-11 ACS

Looking back at historical census data it appears that while there were disproportionately greater housing needs among Hispanic households in previous decades, these differences have decreased across all income groups.

% of Greater Housing Problems Among Hispanic Households versus all Wisconsin Households

	2007-11		2000		1990	
	Hispanic Households	All Households	Hispanic Households	All Households	Hispanic Households	All Households
Extremely Low Income	86.6%	81.8%	82.7%	75.6%	87.3%	78.7%
Low Income	75.0%	67.8%	64.9%	54.4%	73.8%	58.8%
Moderate Income	40.4%	38.7%	37.6%	28.1%	34.9%	27.6%
Middle Income*	24.8%	24.7%	20.2%	8.6%	20.5%	14.4%

*Middle Income for 2007-11 is defined as 80-100% AMI, for 2000 is defined as >80% AMI, for 1990 is defined as 81-95% AMI

The reason for the decrease in disproportionately greater housing need among Hispanic households appears to be the result of the increasing proportion of housing problems experienced by all other households (predominately White), and not that the percentage of Hispanic households with housing problems has decreased.

If they have needs not identified above, what are those needs?

Not applicable.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

This Consolidated Plan is for a state grantee. The state is diverse in its racial and ethnic composition in the major cities, and less diverse in the outlying rural areas. There are numerous areas across the state with concentrated populations, including African American, Hispanic, Asian, and others, but these are typically found in the entitlement areas of the State.

NA-35 PUBLIC HOUSING – (OPTIONAL)

Introduction

In Wisconsin, the Division of Housing does not directly administer public housing funds. There are 120 Public Housing Authorities (PHAs) in the State of Wisconsin. Of the 120 Public Housing Authorities, 58 provide low rent units, 24 provide Section 8 vouchers, and 38 are combined low rent units and Section 8 vouchers. The Division of Housing is responsible for non-entitlement Annual and 5-Year Public Housing Authority (PHA) Plan reviews, in which DOH ensures that the PHA Plan is consistent with the Consolidated Plan. Of the 120 Public Housing Authorities, 17 are within entitlement cities or counties and are therefore not required to submit a PHA Plan to DOH for review. At this time there is one Public Housing Authority designated as “troubled”. We are not aware of any PHA jurisdiction under requirement of a Section 504 Voluntary Compliance Agreement – meaning, DOH is unaware of a public housing authority which has received a complaint from an individual who has experienced disability discrimination under Section 504.

Wisconsin Housing and Economic Development Authority (WHEDA) serves as an administrator of Section 8 Voucher Program funds. Additional information regarding Section 8 funds as well as WHEDA’s updated Annual and 5-Year Plan is available at www.wheda.com/root/RentalResources/Default.aspx?id=257.

The Division of Housing conducted a Public Housing Survey which was sent to 188 contacts at the 120 Wisconsin Public Housing Authorities. The survey was open from July 14th, 2014 – August 1st, 2014 and had 94 respondents (not all respondents answered every question). The Division of Housing used the results from the self-reporting PHA survey to answer the following questions. To the best of our ability, the data below (as well as in the other public housing sections in this Consolidated Plan) reflects all Public Housing Authorities in Wisconsin.

Totals in Use

This table details the number of vouchers and units by public housing program type administered by Wisconsin’s 120 Public Housing Authorities. This table uses HUD’s prepopulated data collected by the Public and Indian Housing Information Center. The program types used in the table are defined below:

- Certificate – The Section 8 Rental Certificate program increases affordable housing choices by allowing very low-income families to choose privately owned rental housing. Families apply to a local PHA or administering governmental agency for a Section 8 certificate. The PHA pays the landlord the difference between 30% of the household’s adjusted income and the unit’s rent.
- Mod-Rehab – The moderate rehabilitation program provides project-based rental assistance for low-income families. Assistance is limited to properties previously rehabilitated pursuant to a housing assistance payments (HAP) contract between an owner and a PHA.
- Public Housing – The total number of units in developments operated by the Public Housing Authorities within the jurisdiction.
- Vouchers:

- Total – The total number of Section 8 vouchers (project-based plus tenant-based) administered by the PHA.
- Project-based – The total number of project-based Section 8 vouchers administered by the PHA.
- Tenant-based – The total number of tenant-based Section 8 vouchers administered by the PHA.
- Special Purpose Vouchers:
 - Veterans Affairs Supportive Housing – The HUD-Veterans Affairs Supportive Housing program combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA). The VA provides these services for participating veterans at VA medical centers and community-based outreach clinics.
 - Family Unification Program – Family Unification Program funding is allocated through a competitive process; therefore, not all Public Housing Authorities administer the program.
 - *Disabled – In this table, disabled includes non-elderly, mainstream 1-year, mainstream 5-year, and nursing home transition.

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	209	11,735	26,417	630	24,935	164	128	265

Table 20 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

This table displays the characteristics of public housing residents – both those that inhabit public housing units and those who utilize Section 8 housing vouchers – by program housing type. This table uses HUD’s prepopulated data collected by the Public and Indian Housing Information Center.

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	41	168	224	13	159	34	16
# of Elderly Program Participants (>62)	0	6	4,584	4,858	156	4,614	10	0
# of Disabled Families	0	26	3,417	8,755	268	8,046	91	17
# of Families requesting accessibility features	0	209	11,735	N/A	N/A	N/A	N/A	N/A
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 21 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

This table displays the racial composition of residents for each public housing program. This table uses HUD's prepopulated data collected by the Public and Indian Housing Information Center.

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	117	7,980	15,022	366	14,141	96	67	232
Black/African American	0	81	3,215	10,570	226	10,056	63	58	31
Asian	0	3	383	427	20	369	0	1	1
American Indian/Alaska Native	0	8	146	374	17	347	4	2	1
Pacific Islander	0	0	11	24	1	22	1	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 22 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

As HUD distinguishes between race and ethnicity, this table displays the ethnic composition of residents for each public housing. This table uses HUD's prepopulated data collected by the Public and Indian Housing Information Center.

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	19	359	1,429	27	1,364	5	11	7
Not Hispanic	0	190	11,376	24,988	603	23,571	159	117	258

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 23 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Public Housing Authorities were asked to report on the needs of public housing tenants and applicants in the Public Housing Survey. There were 48 responses; some Public Housing Authorities recorded multiple needs. The most cited concerns were:

- Economic concerns or lack of jobs in the jurisdiction (28 respondents)
- Need for supportive services (19 respondents)
- Need for affordable housing (10 respondents)
- Access to affordable and safe transportation (8 respondents)
- Greater need for accessible units (7 respondents)
- Need for safe housing (2 respondents)
- Need for 3, 4, or 5 bedroom family housing (1 respondent)

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance?

There were 48 respondents to questions regarding waiting lists. Since only a portion of Wisconsin's Public Housing Authorities responded to the survey, it is important to note that the total number of persons on the waiting lists is an undercount. A summary of the status of waiting lists is below.

- 2 Public Housing Authorities reported having a problem of too many vacancies.
- 37 Public Housing Authorities reported having a waiting list for their public housing units. In total, they reported 15,352 families or individuals on their public housing unit waiting lists.
- 18 Public Housing Authorities reported having a waiting list for housing vouchers. In total, these 18 report having at least 9,759 families or individuals on the waiting list for housing vouchers.

Many of the survey responses pointed out that waiting lists are filled with households who, while waiting, do not have other resources. These responses are listed below.

- One PHA reported having a "1.5-2 year waiting list for [their] housing vouchers."
- Another PHA explained that "our waiting list for the Section 8 community-based voucher program has been closed to new applicants for almost 5 years. The wait was over 7 years when we closed it to new applicants."
- One PHA stated that "few [families or individuals on the waiting lists] have payees or families that assist them with bill paying," therefore their main concern being economic stability.
- Another PHA noted that families or individuals on the waiting lists need supportive services or "assistance with economic self-sufficiency and employment" or, as another PHA described, supportive services "that assist in achieving self-sufficiency through education and employment skills that earn families a livable income."
- Another major concern highlighted by one PHA was a need for supportive services regarding "parenting and life skills education" or "daycare and other assistance to enable [families on the waiting lists] to obtain and maintain employment."

Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

The most immediate needs, according to the self-reporting Public Housing Survey conducted in July 2014 are:

- Economic/access to jobs,
- Accessible housing units for elderly and persons with disabilities,
- Supportive services,
- Access to affordable transportation,
- Larger housing units for families (3, 4, or 5 bedroom housing units) and persons with disabilities.

How do these needs compare to the housing needs of the population at large

The needs of public housing residents and housing choice voucher holders are similar to the needs of the rest of the low-and moderate-income population in Wisconsin. Many of these needs stem from the same core issues: low incomes, unemployment, an aging housing stock, and an aging population.

Discussion:

In much of Wisconsin the demand for public housing greatly overwhelms existing public housing stock, meaning there is a greater need for public housing than the state is able to supply. This is evidenced in statewide lengthy PHA waiting lists as well as closed waiting lists. In spite of this, there are Public Housing Authorities in Wisconsin that have reported it as their goal in their PHA Plans to decrease unit vacancies, meaning that certain Public Housing Authorities in Wisconsin are not meeting the public housing demands of their jurisdiction. However in Wisconsin, Public Housing Authorities with vacancies appear to be the exception whereas Public Housing Authorities with waiting lists are the norm.

When asked how the Division of Housing can support Public Housing Authorities in meeting the needs of individuals or families on the waiting lists, 66 Public Housing Authorities responded. Some of the 66 listed multiple needs, however, the top suggestions as to PHA's needs were:

- 44 mentioned a need for increased program funding – particularly capital investments,
- 11 noted a need for increased funding for administration and administrative tasks,
- 6 mentioned needing other services (two examples being, funding for solar panels and energy efficient developments and funding for supportive services),
- 3 mentioned a need for education,
- 3 mentioned a need for longer shelter stays or a greater access to shelters,
- 2 mentioned a need for funding related to elderly programming,
- 2 mentioned difficulty with voucher guidelines (HUD voucher guidelines don't apply to their jurisdiction).

Introduction

Homelessness is a complex societal problem with multiple roots. A lack of affordable housing, substance abuse, mental illness, and a lack of financial resources are some of the many contributing factors to homelessness. Difficult economic conditions have simultaneously led to reduced resources for homeless service providers and increased need by those experiencing homelessness. The number of clients receiving services and shelter from Homeless Management Information System (HMIS) participating agencies in Wisconsin has increased 13% from 2009 to 2013, from 24,294 to 27,556. Though some of this increase can be attributed to new agencies contributing data to HMIS, it still signals that homelessness has risen over time. In Wisconsin, homelessness is the most visible in metropolitan areas, but also exists in the most rural counties in the state. Persons experiencing homelessness have a variety of backgrounds, demographic characteristics, and needs. Ending homelessness will require alternatives designed to meet the diverse needs of those experiencing homelessness.

The following table includes information gathered in the January 2014 Point-in-Time Count. A total of 6058 persons were counted on this single point in time, a rate of homelessness of 11 people per 10,000 people. This rate is less than the national average of 19 people per 10,000 people.

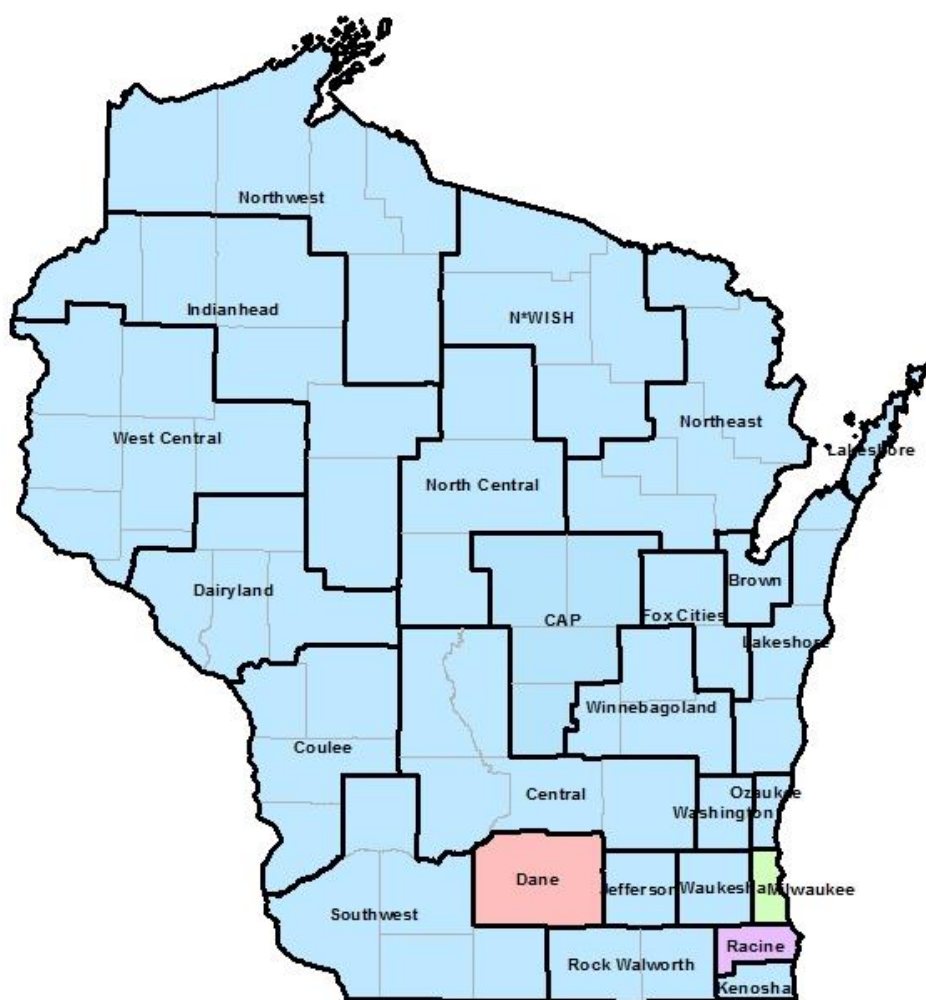
Data Table: Homeless Needs Table

Population	Estimate the # experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adults and Children	3,039	90				
Persons in Households with Only Children	26	4				
Persons in Households with only Adults	2,661	249				
Chronically Homeless Individuals	329	40				
Chronically Homeless Families	79	0				
Veterans	496	24				
Unaccompanied Youth	26	4				
Persons with HIV	16	2				
Sources: January 2013 PIT Data, Homeless Management Information System, Institute for Community Alliances						

Because Wisconsin covers a large geographic area, it is divided for analysis purposes. Data is presented describing the four HUD Continua of Care: Dane County Continuum of Care, Milwaukee County Continuum of Care, Racine County Continuum of Care, and Balance of State Continuum of Care. The Balance of State Continuum of Care, which represents 69 of the 72 Wisconsin counties, is divided into “Local Continua” regions, which are used by the Balance of State for governing purposes. The map below shows these regions.

Figure: HUD Continuum of Care and BOS Local Continuum of Care Regions

HUD Continuum of Care and BOS Local Continuum of Care Regions



Data in the following sections comes from the Institute for Community Alliances “The State Homelessness in Wisconsin 2013” report. The following table shows the number of persons accessing an emergency shelter in calendar year 2013 by Continuum of Care and by Local Continuum of Care in the Balance of State regions. Though 42% of clients experienced homelessness in Dane and Milwaukee Counties, the data also show that homelessness occurs at high rates in less populated areas of Wisconsin. Additionally, chronic homelessness, which is often presumed to be exclusively associated with the downtown core of urban areas, occurs across Wisconsin.

Data Table: Homelessness by Continuum of Care and BOS Local Continuum of Care

CoC*	Homeless Clients	Homeless Clients per 10,000 Residents	Children	Adult Men	Adult Women	Veterans	Chronically Homeless
BOS-Brown	1,891	74	440	877	570	108	272
BOS-CAP	416	26	85	233	97	87	48
BOS-Central	361	14	148	64	135	4	10
BOS-Chippewa**	201	32	103	34	66	1	8
BOS-Coulee	1,294	62	262	702	329	267	282
BOS-Dairyland	438	27	216	95	125	9	34
BOS-Fox Cities	1,464	64	316	750	395	100	184
BOS-Indianhead	250	21	90	60	95	1	8
BOS-Jefferson	228	27	90	66	73	5	8
BOS-Kenosha	935	56	283	354	277	38	78
BOS-Lakeshore	541	22	119	247	175	39	23
BOS-North Central	860	36	266	320	226	36	78
BOS-Northeast	446	34	172	135	140	12	97
BOS-Northwest	652	69	252	162	241	31	113
BOS-N*WISH	249	29	77	94	76	14	12
BOS-Rock Walworth	1,309	50	505	372	421	106	110
BOS-Southwest	141	10	69	24	45	2	20
BOS-Washington	193	15	45	79	68	10	4
BOS-Waukesha	1,078	27	248	423	401	52	176
BOS-West Central	1,898	71	638	610	636	121	75
BOS-Winnebagoland	1,144	39	304	478	340	52	74
Dane	3,912	77	1,167	1,676	1,042	261	773
Milwaukee	7,742	81	1,875	3,903	1,891	859	1,013

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

As the data displayed in the table and map above shows, homelessness is most prevalent in urban areas, but is also experienced in rural areas. In fact, the rate of homelessness in some of the non-urban local Continua of Care approaches the rate seen in urban areas. Individuals and families who experience homelessness in rural Wisconsin face unique barriers to regaining housing stability. Many of the existing homeless service providers are located in cities surrounded by a large rural area. Some counties and rural areas do not have a shelter facility, and the closest shelters take hours to access by car. This geographic dispersion of providers combined with the transportation barriers often faced by homeless individuals and families can make it difficult to provide services to the rural homeless population. If the area shelters are full, or individuals cannot get to a shelter, they may live in their car or double up with friends, family, or others. This may create unsafe living situations and lead to an undercounting of those who are doubled up but who may have otherwise stayed in an emergency shelter.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Chronically Homeless

To be counted as chronically homeless, an individual has experienced homelessness for a year or longer, or experienced at least four episodes of homelessness in the last three years, and has a disability. This population is vulnerable, with high rates of mental illness and substance abuse disorders. Persons experiencing chronic homelessness represent approximately 11% of the homeless population in Wisconsin, which is less than the U.S rate of chronic homelessness. Because this population tends to have higher rates of emergency room usage, hospitalization, and incarceration, they use a disproportionate share of resources compared to the rest of the homeless population.

Veterans

Homeless Veterans represented 8% (2,164) of the homeless population in 2013. A national effort to end veteran homelessness has led to increased funding for HUD-Veterans Affairs Supportive Housing vouchers and the Supportive Services for Veteran Families program. According to the United States Interagency Council on Homelessness, there has been a 33% decrease in homelessness among veterans in the United States since 2010. National decreases in veterans' homelessness have outpaced the decreases seen in Wisconsin. Mayors in Madison and Milwaukee have signed onto the "Mayors Challenge" to end veteran's homelessness. In addition, there has been increased education of homeless service providers by veterans' program staff, spurring efforts to refer homeless veterans to the HUD-Veterans Affairs Supportive Housing and Supportive Services for Veteran Families programs.

Unaccompanied Youth

Unaccompanied youth are homeless youth that are not accompanied by a parent or guardian. Family conflict is often the cause of youth homelessness. The subpopulation of unaccompanied youth is difficult to track, and often double up, couch surf, or live on the streets. In 2013, 591 unaccompanied children received homeless services from HMIS participating providers, representing 2% of the homeless population. The Department of Public Instruction (DPI) also measures youth homelessness using a more

expansive definition of homelessness, which also includes youth that are doubled up or couch surfing. The DPI 2012-2013 End-of-Year Report indicates that there were 2,054 unaccompanied youth reported or identified during the school year. The Wisconsin Association of Homeless and Runaway Youth Services served 143 unaccompanied youth in fiscal year 2013. Though DOH funds runaway and homeless youth shelters, the Department of Children and Families (DCF) is responsible for many programs which provide services to unaccompanied homeless youth. DCF funds 22 programs that provide services to youth in crisis, such as street outreach, emergency shelter, and crisis intervention counseling. DCF also responds to youth homelessness among those in, aged out, or at-risk of entering foster care. Research has shown that youth who have aged out of, or have had contact with the foster care system have a greater risk of homelessness than the overall population of youth.

Recent research has shown that homeless lesbian, gay, bisexual, and transgender (LGBT) youth face additional challenges compared to heterosexual youth. Family conflict over a youth's sexual orientation or gender identity may lead to LGBT youth being kicked out of their family's home. The National Gay and Lesbian Task Force and National Coalition for the Homeless estimated that between 20-40% of all homeless youth identify as LGBT. Since only 3-5% of the U.S. population identifies as LGBT, it is clear that nationally, LGBT youth experience homelessness at a disproportionate rate. Wisconsin level data about LGBT status has not been collected at this time, however, a Milwaukee survey conducted by the Cream City Foundation found that 23% of homeless youth surveyed identified as LGBT. The same survey found that LGBT homeless youth tended to be homeless for longer periods of time, report higher incidences of mental illness and substance abuse, and experience higher rates of sexual violence and victimization than their heterosexual peers. More study of this issue is needed in order to fully understand the issues LGBT youth face and effectively target this population.

The following table includes information on the race and ethnicity of those accessing Wisconsin homeless services in 2013. This data was obtained from the Institute for Community Alliances. In 2013, 27,556 persons accessed homeless services, with the following racial breakdown.

Nature and Extent of Homelessness

Race:	Sheltered*	Unsheltered (optional)
White	51%	
Black or African American	38%	
Asian	.6%	
American Indian	3%	
Multi-racial	6%	
Ethnicity:		
Hispanic	7%	
Not Hispanic	93%	
Source: 2013 Data provided by the Homeless Management Information System, Institute for Community Alliances		
*Percentages do not sum to 100% due to a small number of missing values and unknown races.		

Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in Wisconsin to meet housing, business, and infrastructure needs caused by the disasters. One project which provided services to those experiencing homelessness has already been assisted using CDBG-DR funding, and the Division does not anticipate that more will be funded using CDBG-DR funds.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Persons in families represented roughly half of the total homeless population as measured by the January 2014 Point-in-Time Count. Of the 3,129 persons in families with adults and children counted during the Point-in-Time Count, 90 were unsheltered. The Division of Housing received feedback from providers indicating that larger families have trouble finding affordable rental units with 3 or more bedrooms. This lack of larger rental units may increase the time it takes to place a large homeless family in housing.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

All of Wisconsin's racial and ethnic groups are represented in the statistics of those who accessed homeless services in 2013. A slight majority of these clients are white (51%), a significant underrepresentation compared to the Wisconsin population as a whole. African Americans represent approximately 6% of the Wisconsin population (according to American Community Survey data) but 38% of the population accessing homeless services. This is a substantial overrepresentation, and one that has shown up in analysis of HMIS data in years past. American Indians are also overrepresented, representing 3% of the population accessing homeless services, but 1% of the total Wisconsin population. The representation of Hispanic persons is roughly in line with their representation in the general population, with 7% of persons accessing homeless services reporting Hispanic origin, compared with 6.2% of the general population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In the January 2014 Point-in-Time Count, 343 persons were unsheltered, and 5,715 persons were sheltered. In Wisconsin unsheltered homelessness occurs at significantly lower rates than in other parts of the country due to the cold winter climate. Cold weather may lead to doubling up or couch surfing by individuals who may otherwise be counted as homeless, especially in rural areas which lack homeless services. Unsheltered homeless rates are higher during the warmer months, according to data collected during the July Point-in-Time Count.

Discussion:

NA-45 NON-HOMELESS SPECIAL NEEDS ASSESSMENT – 91.305 (B,D)

Introduction

This section describes the housing needs of persons who are not homeless but require supportive housing. These persons include:

- elders (defined as 62 and older),
- frail elders (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework),
- persons with mental, physical and/or developmental disabilities,
- persons with substance use disorders,
- persons with HIV/AIDS and their families,
- Victims of domestic violence, dating violence, sexual assault, and stalking.

HOPWA

The first table details current Housing Opportunities for Persons with AIDS (HOPWA) formula use, whereas the second table details the Number of Persons Living with HIV in the State of Wisconsin. The HOPWA Program is the only Federal program dedicated to the housing needs of people living with HIV/AIDS. Under the HOPWA Program, HUD makes grants to local communities, states, and nonprofit organizations for projects that benefit low-income persons living with HIV/AIDS and their families. HOPWA provides funding through a formula program as well as a competitive program, annual appropriation is divided between the two programs – 90% for formula program grants and 10% for competitive program grants. The tables below discuss only formula program grants. The data in these tables was collected by Centers for Disease Control and Prevention HIV (CDC HIV) Surveillance.

Current HOPWA formula use:	
Cumulative cases of AIDS reported	2,423
Area incidence of AIDS	77
Rate per population	2
Number of new cases prior year (3 years of data)	240
Rate per population (3 years of data)	2
Current HIV surveillance data:	
Number of Persons Living with HIV	2,368
Area Prevalence (Persons Living With HIV per population)	59
Number of new HIV cases reported last year	255

Table 24 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

The table below details the estimate of unmet housing need for three different types of HOPWA assistance (tenant based rental assistance; short-term rent, mortgage, and utility; facility based housing (permanent, short-term or transitional)). The data was gathered from HOPWA Performance Data based on the HOPWA Consolidated Annual Performance and Evaluation Report (CAPER) and the HOPWA Beneficiary Verification Worksheet submitted by the grantee 90 days following the end of the operating year.

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	5
Short-term Rent, Mortgage, and Utility	63
Facility Based Housing (Permanent, short-term or transitional)	0

Table 25 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Elders, Frail Elders, and People with Disabilities:

When discussing special needs populations it is important to recognize that, compared to the general population, people with disabilities have less access to resources as they are more likely to be un- or under-employed, that people living in poverty tend to have a higher incidence of disability, and that elderly populations are more prone to disability as prevalence of disability increases with age. Because of this, elders, frail elders, and persons with disabilities are populations disproportionately susceptible to poverty and poor living conditions. Based on the *Olmstead vs. L.C.* decision, 1999, people with disabilities have the right to live in the community with community-based supports.

According to population projections prepared by the Department of Health Services, the Wisconsin population of persons aged 65 and older is expected to grow from 900,170 to 1,060,620 between 2015 and 2020. This increases the proportion of those aged 65 and over from 15% of the total population to 17% of the total population. According to the American Community Survey, the elderly population in Wisconsin is roughly 800,000. Over 250,000 or 32% have a disability. Seven percent of elders live below the poverty level and another 10.8% have income from 100 to 149% of poverty. Nearly 57% of all elderly renters are experiencing a cost burden (have rental costs greater than 30% of household income).

The Department of Health Services reports that almost 640,000 people in Wisconsin, or over 11% of the population, have a hearing, vision, cognitive, ambulatory, self-care, or independent living disability. Of these, more than 380,000 are under 65 years of age. According to the Wisconsin Council on Physical Disabilities, an average of 6% of the population age 18 to 65 and 65+ require the use of special equipment for mobility.

Persons with substance use disorders:

Addiction has large societal costs and behavioral health disorders are an increasing public health concern. According to the 2012 Wisconsin Epidemiological Profile on Alcohol and Other Drug Use, since

at least 2000, rates of alcohol dependence, alcohol abuse, and alcohol-related motor vehicle fatalities have been higher in Wisconsin than in the United States as a whole. Because of this, Wisconsin's experiences with the consequences associated with alcohol use (mortality, morbidity, and dangerous criminal behavior) have also tended to be higher than the national average.

The prevalence of use of illicit drugs (marijuana, cocaine, heroin, inhalants, methamphetamines, and non-medical use of prescription drugs) for ages 12 and older of are detailed in the Wisconsin Epidemiological Profile. This study shows that Wisconsin's drug law violations remain lower than the national average however consumption patterns of illicit drugs in Wisconsin mirror national trends.

Victims of domestic violence, dating violence, sexual assault, and stalking:

Domestic violence is difficult to track as victims of domestic violence do not often report incidences to law enforcement because they often fear for their safety or lack access to needed resources and/or support. Sexual violence is similarly difficult to track, however, according to the 2010 National Intimate Partner and Sexual Violence Survey, sexual violence is a significant public health problem that affects nearly a million people in Wisconsin. Many providers collect data regarding domestic and sexual violence (for example: law enforcement, hospitals, and domestic and sexual violence advocacy agencies). Because domestic violence is under-reported and falls under varying definitions, domestic violence data is difficult to analyze.

In consultation with the Department of Children and Families, these statistics regarding victims of domestic violence, dating violence, sexual assault and stalking were provided:

- 711,000 Wisconsin women have been attacked, raped, or stalked by an intimate partner. Approximately half a million of these women were fearful or concerned for their safety.
- In the *reporting* period October 1, 2012 – September 30, 2013, 38,270 victims of domestic violence and their children received services from a Wisconsin domestic abuse program. This includes 7,446 persons who received safe shelter.
- In the same reporting period, 3,000 adults were turned away due to the shelter being full. Many of the shelter turn-aways occur in urban areas, but increasingly, rural programs, such as those in Antigo, Superior, and Baraboo have had to turn victims away due to the shelter being full. The ESG program funds domestic violence shelters across the state. Funding is contingent on the number of clients served, which helps direct funding to areas where it is needed most.
- Domestic abuse programs reported 292,450 contacts of supportive counseling and advocacy for adult victims of domestic abuse in the last reporting period. This is a 5.2% increase over the previous year.
- Although the average shelter stay is approximately 30 days, domestic abuse programs report more victims needing to stay for periods of three to six months or longer before they can obtain the resources to live independently.
- In the 2013 Domestic Violence Counts, a one-day, unduplicated census count of adults and children seeking services, Wisconsin programs served 2,072 victims, with 924 in safe shelter. 188 persons were turned away due to shelters being full.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elders and Frail Elders:

The housing needs of the elderly are projected to grow as the baby boomer generation ages and advances in medical technology extend the average lifespan. Elders and frail elders may face housing cost burdens related to affordability or may need home modifications and supportive services that allow them to age in place. In addition, access to transportation, health care, and other public and private resources, facilities, and services are considered when weighing housing options. According to national research conducted by Fannie Mae, an increasing share of elders (aged 65-74) and older elders (75 and older) are choosing to live in housing units, rather than group quarters. This presents particular housing challenges to the older elders, who have higher rates of disability and more medical needs. The need for specialized or retrofitted housing and supportive services will continue to grow as elderly populations increase. Policies seeking to accommodate frail elders should incorporate affordability, accessible design in both residential and group homes, and increased supportive services to meet the needs of an aging population.

Persons with Disabilities:

Persons with disabilities face a range of housing related issues. The amount of benefit received as part of the Supplemental Security Income program places a person in the HUD “extremely low-income limit” group in Wisconsin. Many people with disabilities who rely on Supplemental Security Income payments fall into this category. Limited income may mean that persons with disabilities face severe cost burdens. Besides affordability, persons with disabilities also face issues related to accessibility in housing, aging caregivers, and housing discrimination. As with elders, access to transportation, health care, and other facilities and services are important factors when weighing various housing options. Financing for housing rehabilitation and modification to allow persons with disabilities to function independently or make homes accessible will continue to be a critical need. Overall, the most common housing problems for persons with disabilities is affordable, accessible, safe housing that is integrated into their chosen community. The Wisconsin Council on Physical Disabilities also identifies “visitability” as a housing problem experienced by persons with physical disabilities. “Visitability” is achieved when persons with a physical disability – for example people who depend on wheelchairs, scooters, and other assistive mobility devices – are able to visit family or friends without facing barriers to access to their family or friends’ homes (that their family’s and friends’ homes are accessible). In addition to visitability, The Wisconsin Council on Physical Disabilities identifies “universal design” – designing products and spaces so that they can be used by the widest range of people possible – as a way to best meet the different needs of persons with disabilities. Universal design, although not always possible to construct due to demand and funding, makes housing safer, more accessible, and more convenient for everyone.

Persons with substance use disorders:

Dependence on drugs and/or alcohol is one of the most significant risks that alcohol or drug user faces, as it can lead to health problems. Users who inject drugs risk contracting HIV, hepatitis C, and other infectious diseases. Alcohol-Related Disease Impact software from the Centers for Disease Control and Prevention identifies the proportion of deaths that are alcohol-related for a total of 54 chronic and acute conditions. Mortality from alcohol-related liver cirrhosis is a direct consequence of chronic alcohol consumption. Health problems resulting from substance abuse can cause a financial burden, lead to a physical or mental disability, and also an inability to work. In addition to health concerns and health care

needs, addictive disorders disrupt relationships with family and friends and can cause people to lose their jobs. For those already struggling financially, a loss of income could also cause them to lose their housing. It is also important to note that substance use disorders can be a result of a loss of housing rather than a cause as substance use can be a coping mechanism for those in difficult situations.

Victims of domestic violence, dating violence, sexual assault, and stalking:

Victims of domestic violence face a variety of economic barriers to self-sufficiency. They may lack access to financial resources due to the actions of their abuser. Residents of public or subsidized housing may face an added challenge as the abuser may be the one on the lease. Affordable housing was identified as the top need by both domestic violence victims and service providers in the 2009 Wisconsin Domestic Violence Long Range Plan. A lack of affordable housing causes longer stays in shelters. This, in turn, causes shelters to be full which may lead to families being turned away.

The most common housing problems experienced by victims of domestic violence, dating violence, sexual assault, or stalking as identified by the Department of Children and Families are:

- Domestic violence is a leading cause of homelessness for women and their children. Between 22% and 57% of all homeless women report that domestic violence was the immediate cause of their homelessness. Additionally, 38% of all victims of domestic abuse become homeless at some point in their lives.
- A victim of domestic violence will often leave an abuser multiple times before finally escaping the violence, therefore experiencing multiple periods of homelessness.
- Abusers commonly undermine a victim's economic stability, making victims more vulnerable to homelessness. Many victims and survivors of domestic violence have trouble finding rental properties because they may have poor credit, rental, and employment histories as a result of their abuse.
- In April 2014, the Governor's Council on Domestic Abuse and End Domestic Abuse began a long-range planning process for domestic abuse services. Surveys and interviews were conducted with: domestic abuse program directors and advocates; domestic abuse survivors; and community partners. Safe, affordable and accessible housing was consistently identified as one of the top needs of domestic violence victims.
- Domestic violence victims continue to need the immediate safety, privacy, and confidentiality that a domestic abuse shelter affords. Domestic abuse shelters have an on-going need for adequate staffing, maintenance and upkeep, adjunct supportive services, and accessible, trauma-informed design.
- Domestic violence programs across the state report a lack of affordable housing resources in their area. The waiting list for local housing authority vouchers can be extremely long, ranging from several months to almost two years. This is much longer than the average stay at a domestic abuse shelter. As affordable, long-term housing options become scarcer, victims are staying longer in shelters. As a result, shelters are full and must turn families away.
- Additional housing-related needs of domestic violence victims identified in the Long-Range Planning process include: rental assistance until a survivor can pay rent independently; financial assistance to pay back rent or utilities; case management and legal assistance to help a survivor remain in current housing; and advocacy strategies to help a survivor address legal and other barriers to achieving safe, permanent housing.
- Safety and confidentiality are key needs of domestic abuse victims and cornerstones of all service provision, not just shelter services. Strong collaborative partnerships, including cross-

referral and information-sharing protocols, must continue to afford victims basic privacy and confidentiality safeguards. Safety considerations should be embedded in all aspects of service provision, including housing location.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the AIDS Resource Center of Wisconsin, more people than ever are living with HIV/AIDS in Wisconsin. HIV/AIDS continues to threaten Wisconsin's population, especially the next generation. Reflecting national trends, young Black/African American men who have sex with men in Wisconsin continue to be the population most affected by HIV/AIDS in Wisconsin. In 2013, 255 cases of HIV infection were diagnosed in Wisconsin. Between 2004 and 2013, the number of diagnoses ranged from a low of 255 in 2012 to a high of 284 in 2009, with an average of 253 diagnoses per year. Four times as many males as females were diagnosed in 2013. The only age/sex group with statistically significant changes in diagnoses between 2004 and 2013 was males under age 30; diagnoses increased by 38% in this group. HIV infection disproportionately affects racial/ethnic minorities. Among males, the rate of HIV diagnoses during 2009-2013 was more than ten-fold greater among Blacks and five-fold greater among Hispanics compared to Whites. Among females, the disparity was even greater; the rate of HIV infection was more than 25-fold greater among Blacks and more than five-fold greater among Hispanics and Asians compared to Whites.

In 2013, HIV cases were diagnosed in 29 of the 72 counties in Wisconsin, the distribution was uneven:

- Milwaukee County cases accounted for 51% of new diagnoses,
- Dane County for 12%,
- Racine for 5%,
- Kenosha and Brown Counties each for 3%,
- all other counties accounted for fewer than 3% of diagnoses.

Additionally, in 2013, 140 individuals previously diagnosed with HIV infection moved to Wisconsin from another state. As of the end of 2013, 6,758 individuals reported with HIV or AIDS were presumed to be alive and living in Wisconsin, 76% of these were first diagnosed in Wisconsin. An estimated 1,270 are unaware of their HIV infection in Wisconsin (as CDC estimates 15.8% of people living with HIV are unaware of their HIV status). Of Wisconsin's known cases, 10% are under 30, 50% are 30-49, and 40% are 50 or older. Therefore, services for people living with HIV need to address health conditions of aging in addition to HIV infection. As persons living with HIV/AIDS are disproportionately living in urban areas in Wisconsin, urban housing problems need to be addressed in addition to HIV/AIDS infection.

Discussion:

Comorbidity, or the simultaneous presence of two chronic diseases or conditions, is something to be considered when discussing special needs populations and housing needs. An individual or family may experience a multi-level need as they experience one or more special needs. Persons with concurrent disorders, or co-occurring addiction and mental health problems, are of particularly high need and are often disconnected from mainstream services.

NA-50 NON-HOUSING COMMUNITY DEVELOPMENT NEEDS - 91.315 (F)

The Division of Housing CDBG programs provide grants and loans to CDBG eligible local governments to help them serve low- and moderate-income persons. The program is open to all local units of government that do not receive CDBG funds directly from HUD. The primary goals of DOH's CDBG program include:

- Ensuring the affordability of basic services that enhance community vitality;
- Promoting improved housing and economic opportunities for low- and moderate-income households;
- Supporting revitalization of established neighborhoods, downtown business districts and blighted sites;
- Assisting with capital improvements projects that support previous planning efforts and are part of broader community development strategies;
- Facilitating access to public facilities;
- Encouraging the use of energy efficient design, retrofitting, and equipment, as well as projects that benefit bicyclists and pedestrians;
- Improving accessibility to public facilities; and
- Responding to natural and man-made disasters or catastrophic events.

Below details Wisconsin's community development needs by categories designated by HUD: public facilities, public improvements, and public services.

Describe the jurisdiction's need for Public Facilities:

The Division of Housing conducted an online public survey to solicit input regarding community development and public facilities needs, among other topics. Wisconsin's public facilities are, on the whole, old and in need of rehabilitation. Many responses indicated that foreclosed and damaged properties need to be repurposed into projects beneficial to their community or neighborhood. Some respondents also mentioned that poorly maintained or blighted buildings need to be repaired, rehabilitated, or demolished – particularly buildings with lead-based paint hazards. Participants also felt that recreational facilities (for example parks), affordable daycare centers, community centers, senior centers, and fire stations need to be rehabilitated, or in some cases, constructed. Building accessible recreational facilities, specifically accessible bathrooms in public facilities, was also highlighted as a public facilities need.

Participants were asked to rank six different public facilities priorities in order of importance based on the needs of their communities. The ranked priorities are below, ordered from the highest priority to the lowest priority.

1. Fund community development planning efforts that spur new investment
2. Address public infrastructure deficiencies such as storm sewers or streets
3. Assist in building or rehab of fire stations, libraries, or other public facilities
4. Support energy efficient design and retrofitting in public facilities
5. Fund accessibility modifications such as wheelchair ramps in public facilities
6. Support projects that respond to natural disasters or mitigate hazards

How were these needs determined?

Needs were determined via an assessment of past and present public facilities grants, an online public survey which solicited public input, consulted with stakeholders, and spoke with Division of Housing grants specialists.

Describe the jurisdiction's need for Public Improvements:

Survey respondents noted that there is a need for repairs to streets, street lighting, sewers, water supply or water mains, and blighted buildings. Many of Wisconsin's cities and villages also need general reconstruction of their main street. Respondents also indicated that funds are needed, not only for reconstruction or rehabilitation, but also for project administration as some public projects have been poorly maintained. Property damage from flooding and other natural disasters or catastrophic events was also mentioned in the survey.

How were these needs determined?

Needs were determined via an assessment of past and present public facilities grants, an online public survey which solicited public input, consulted with stakeholders, and spoke with Division of Housing grants specialists.

Describe the jurisdiction's need for Public Services:

HUD allows up to 15% of yearly CDBG allocation to be used on eligible public services activities. When asked, during public input sessions and surveys, about the need for increased funds for public services, stakeholders and residents frequently agreed that there is a need for increased funding for public services. The needs were diverse but followed similar trends. In all areas of the state, respondents felt that there was an urgent need to provide supportive services, treatment, and/or aftercare services for special needs populations (see NA-35 regarding special needs populations) – persons who experience chronic homelessness, due to mental health issues or substance abuse, and victims of domestic violence were most frequently mentioned. Public Input session attendees also cited transportation issues as exacerbating employment and housing issues, especially in areas in which a car is needed to access employment and services.

How were these needs determined?

Needs were determined via an assessment of past and present public facilities grants, an online public survey which solicited public input, consulted with stakeholders, and spoke with Division of Housing grants specialists.

Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in

Wisconsin to meet housing, business, and infrastructure needs caused by the disasters. The Division of Housing estimates that 14 public facility/infrastructure projects are still in need.

HOUSING MARKET ANALYSIS

MA-05 OVERVIEW

Housing Market Analysis Overview

The Market Analysis provides an overview of the environment in which the Division of Housing will administer its programs over the course of the 2015-2019 Consolidated Plan. The Market Analysis details: General Characteristics of the Housing Market; Lead-Based Paint Hazards; Public and Assisted Housing; Assisted Housing, Facilities, Housing, and Services for Homeless Persons; Special Need Facilities and Services; Barriers to Affordable Housing; and Non-Housing Community Development Assets.

MA-10 – 20: General Characteristics of the Housing Market

- Wisconsin's housing market varies by region. However, the most common themes are an aging housing stock and the prevalence of 1-unit detached structures (or single family housing). There is a shortage of affordable housing among all housing types. Much of the existing affordable housing stock is in poor condition and in need of rehabilitation.
- Lead-Based Paint Hazards: 64% of Wisconsin's owner-occupied housing stock and 65% of Wisconsin's renter-occupied housing stock were built before 1980. HUD estimates three quarters of housing units built before 1980 contain some lead-based paint. Due to this, lead-based paint hazards continue to be a concern in Wisconsin, particularly among housing units built before 1980 with children present.

MA-25: Public and Assisted Housing

- There are 120 Public Housing Authorities in the State of Wisconsin; 58 provide low rent units, 24 provide Section 8 vouchers, and 38 are combined low rent units and Section 8 vouchers. There are a total of 29,393 Public Housing units in Wisconsin at 183 different Public Housing properties across the state, 2,295 units are specifically designated as accessible units for the elderly and/or persons with disabilities.

MA-25: Homeless Facilities

- Wisconsin's emergency shelter and homeless programs vary from community to community, reflecting individual local needs and resources. They are funded through a combination of local, state, and federal funds, and significant local private cash and volunteer contributions. There is a need for funding of programs and interventions which efficiently use public dollars and whose effectiveness is backed up by evidence.

MA-35: Special Need Facilities and Services

- The Division of Housing, Department of Health Services, Department of Children and Families, and Department of Corrections all provide services, resources, and funds to support persons with special needs. Special needs populations addressed in this section include: the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addictions, persons living with HIV/AIDS and their families, victims of domestic violence, dating violence, sexual assault, and stalking, and persons with mental illness.

MA-40: Barriers to Affordable Housing

- Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing varies widely throughout the state and is typically affected by local policies over which the state has little control.

MA-45: Non-Housing Community Development Assets

- There is a significant need for programs targeted towards spurring job creation, programs which train workers with the skills currently demanded by employers, general economic development programs, and community development and planning efforts targeted to ensuring a strong local economy.

MA-10 NUMBER OF HOUSING UNITS – 91.310(A)

Introduction

Wisconsin's housing market varies by region. Two common themes are an aging housing stock and the prevalence of single family detached housing. Though there are some signs that Wisconsin's housing market is beginning to recover from the housing crisis, this recovery is regional. Some areas continue to struggle with a large supply of foreclosed homes and blighted neighborhoods. A shortage of affordable units persists across all types of housing. The Division of Housing funds several programs that aim to increase the availability of safe, accessible, and affordable housing for low and moderate income Wisconsin households.

All residential properties by number of units

The following table shows the number and type of residential properties in Wisconsin. The dominant housing type in Wisconsin is 1-unit detached structures (more commonly known as single family homes), but there is also a large portion of multi-unit structures located in urban areas.

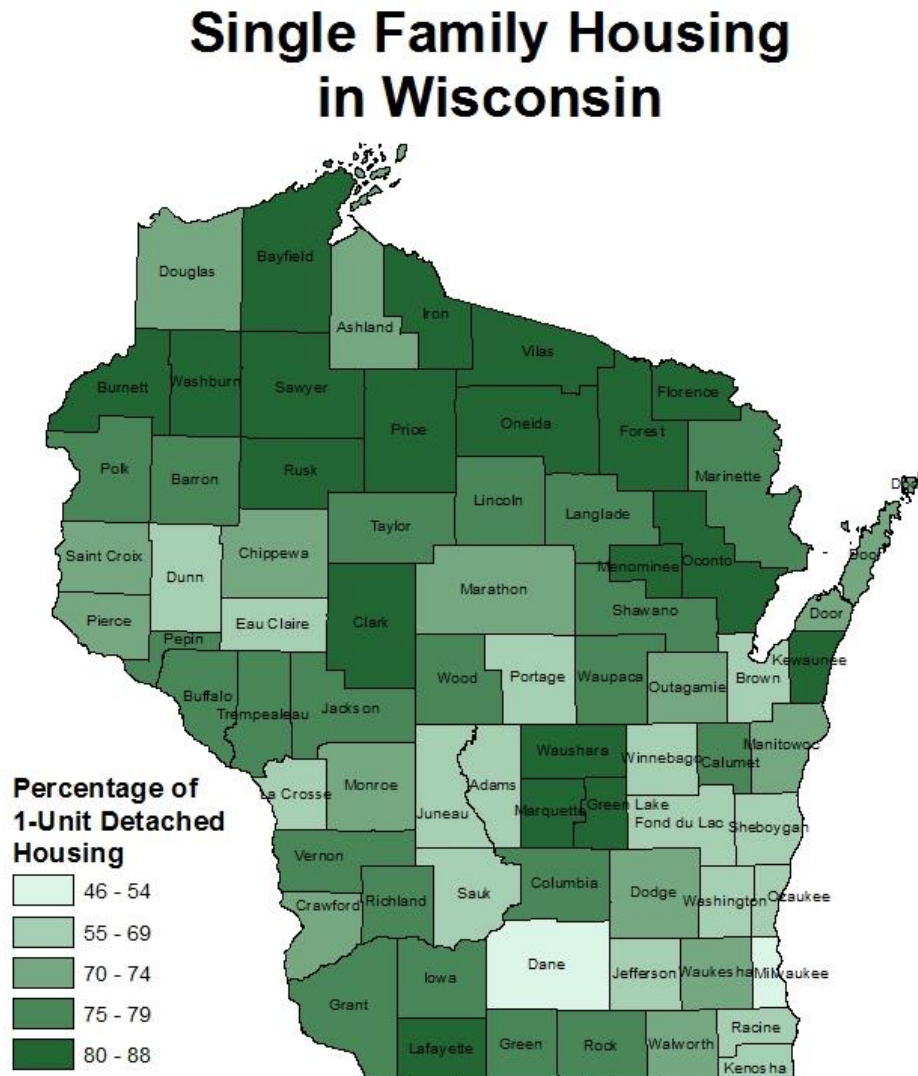
Property Type	Number	%
1-unit detached structure	1,732,919	66%
1-unit, attached structure	113,851	4%
2-4 units	279,068	11%
5-19 units	211,127	8%
20 or more units	173,490	7%
Mobile Home, boat, RV, van, etc.	99,364	4%
Total	2,609,819	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Single Family Housing in Wisconsin

The following map shows the percentage of 1-unit detached structures (single family housing) by county in Wisconsin. Northern and rural housing stock tends to be dominated by single family structures, while counties in the southern and urban areas have larger populations, but proportionally less single family housing stock.



Unit Size by Tenure

The following chart shows the number and percentage of owner-occupied and rental housing stock by size. Owner occupied homes tend to be larger, with 78% of owner occupied structures containing 3 or more bedrooms. Rental units tend to be smaller with the largest percentage of units (46%) containing two bedrooms.

	Owners		Renters	
	Number	%	Number	%
No bedroom	2,057	0%	24,293	3%
1 bedroom	31,383	2%	180,890	26%
2 bedrooms	306,230	19%	316,738	45%
3 or more bedrooms	1,235,049	78%	183,098	26%
Total	1,574,719	99%	705,019	100%

Table 27 – Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Division of Housing funds several programs that further the goal of building affordable housing for low and moderate income Wisconsinites. The CDBG Housing program distributes funding to seven regions in Wisconsin. This funding is used for acquisition, rehabilitation, and homebuyer assistance in each of the regions. The HOME Rental Housing Development Program funded 11 rental housing projects targeted to households with incomes below 60% CMI during the 2013-2014 program year. Through the HOME TBRA program, the Division of Housing funded 8 agencies providing rental assistance to households with incomes below 60% CMI. The HOME Homebuyer/Rehab program funded 21 grantees for the purposes of assisting homebuyers with incomes below 80% CMI and rehabilitating rental properties which rent to households with incomes below 60% CMI. Other Division of Housing programs provided rental assistance to individuals and households experiencing homelessness, at risk of homelessness, or fleeing domestic violence.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There is no comprehensive estimate of units expected to be lost from the affordable housing inventory in Wisconsin. According to the National Housing Trust, 259 rental projects with a total of 12,464 housing units whose project-based Section 8 contracts will expire in the next four years.

Does the availability of housing units meet the needs of the population?

There is a significant shortage of affordable housing for extremely low income households. The National Low Income Housing Coalition estimates that there is a shortage of 137,527 units affordable and available for extremely low income renters. The majority of extremely low income renters in Wisconsin

pay over 50% of their income towards housing, leaving little left over for other vital household expenses. This shortage puts extremely low income households at increased risk of housing instability and homelessness.

There is a shortage of 3 or more bedroom rental units for large families. Large, low income families often have a difficult time qualifying for mortgages, an issue that has worsened in the wake of the housing crisis. Because of this, they must find housing in the rental market, which does not contain an adequate number of 3 or more bedroom units. This can lead to overcrowding (which is further discussed in the housing needs assessment) and/or an inability to find housing.

The dominance of single family housing in northern and rural Wisconsin can also make it difficult for low and moderate income renter families to find housing near employment. Northern and rural counties have very little rental stock, making it difficult for low income families to find housing.

Wisconsin's aging senior population has already begun to affect the demand for housing. There is a need for accessible homes that allow seniors to age in place and senior oriented housing communities that incorporate services. Housing of this type must also take into consideration the fact that many seniors have fixed incomes and cannot afford costly home renovations and senior housing communities.

Describe the need for specific types of housing

Respondents to the Division of Housing's online public survey were asked to rank affordable housing construction and rehabilitation priorities. The rankings are listed below, from highest priority to lowest priority.

1. Build affordable rental housing
2. Rehabilitate affordable rental housing
3. Rehabilitate affordable owner occupied housing
4. Build affordable owner occupied housing
5. Convert market rate housing into affordable housing

Similar feedback was received in public input sessions, with attendees mentioning a lack of rental housing in rural areas and a lack of rental housing affordable to low income households in urban areas.

Discussion

MA-15 COST OF HOUSING – 91.310(A)

Introduction

The cost of housing has increased in Wisconsin over the last 15 years. Wages have not kept pace, leading to an affordability crisis for many low and moderate income Wisconsin households.

Cost of Housing

The following table shows the median home value and contract rent in Wisconsin.

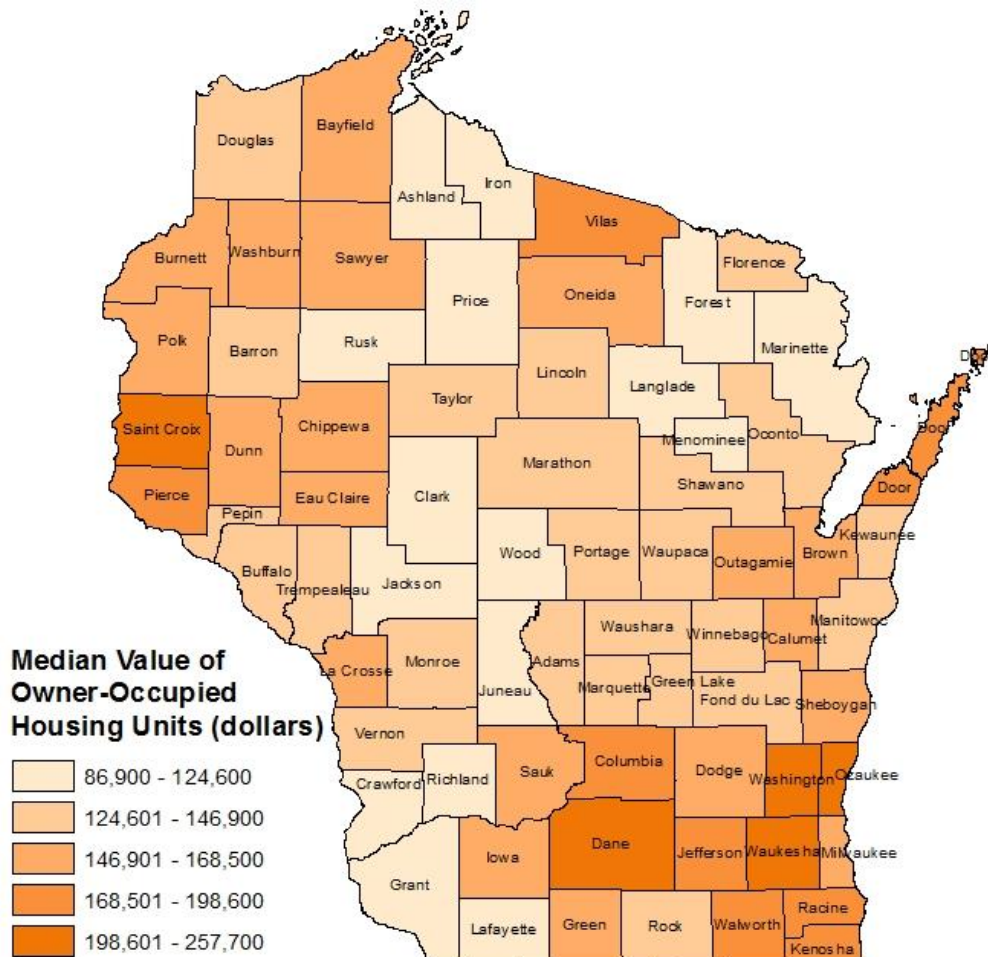
	Base Year: 2000	Most Recent Year: 2010	% Change
Median Home Value	109,900	169,700	54%
Median Contract Rent	473	614	30%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

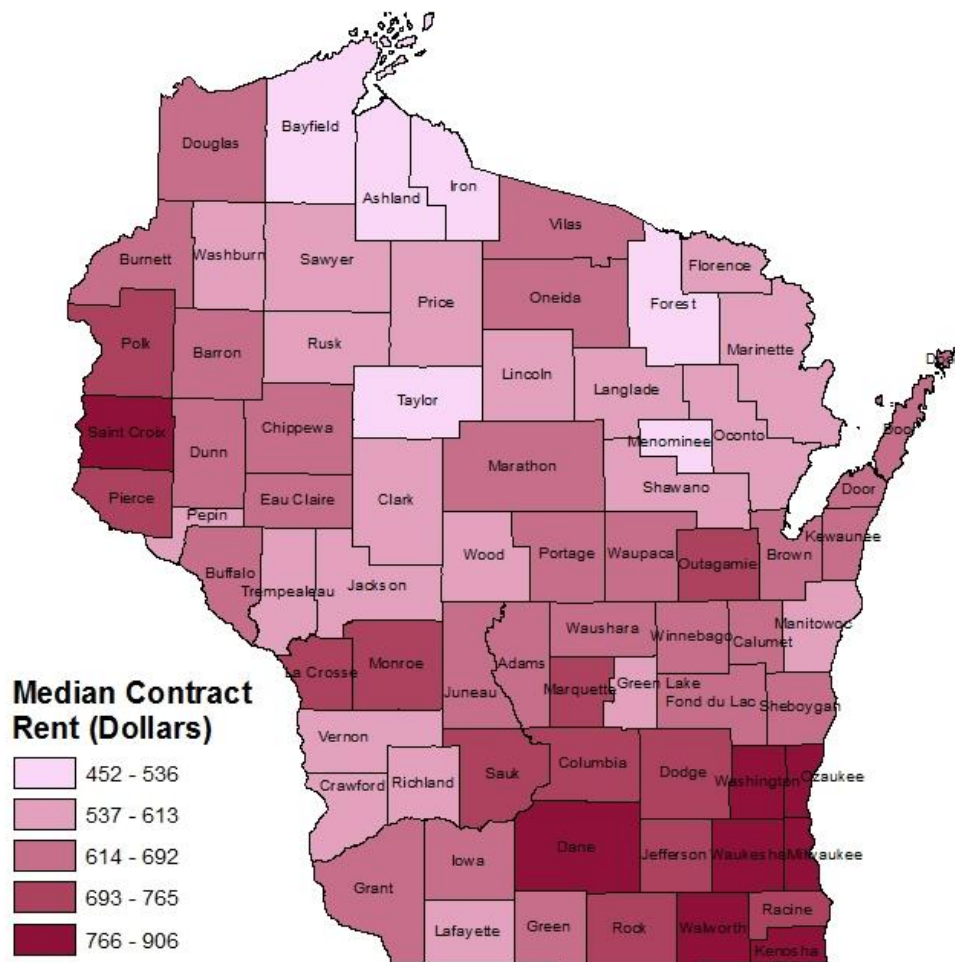
Median Value of Owner-Occupied Units

The following figure shows the median value of owner-occupied units by county in Wisconsin. Housing values are the highest in growing metropolitan areas, such as the counties surrounding Milwaukee, Dane County, and the Counties across the border from the Minneapolis/St Paul, Minnesota area. Housing values are the lowest in the most rural counties of Wisconsin.



Median Gross Rent

The following figure shows the median gross rent by county in Wisconsin. Trends in gross rent are similar to those seen in the owner-occupied market, with high gross rents in growing metropolitan areas and lower gross rents in rural areas.



Contract Rent Paid

The following table breaks up the number and percent of renter households by cost category.

Rent Paid	Number	%
Less than \$500	228,585	32.4%
\$500-999	416,081	59.0%
\$1,000-1,499	46,959	6.7%
\$1,500-1,999	7,569	1.1%
\$2,000 or more	5,825	0.8%
Total	705,019	100.0%

Table 29 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

The following table shows the number of rental and owner-occupied units available to households at various income levels. When looking back at the data in the housing needs assessment that describes the number of households at each income level, there is a clear shortage of units available to low and moderate income households. Another contributing factor to the shortage of affordable units is the fact that in many cases, affordable units are unsubsidized and do not have income restrictions. In this case, households who are making higher incomes may reside in these units in order to reduce their housing costs.

% Units affordable to Households earning	Renter	Owner
30% HAMFI	49,920	No Data
50% HAMFI	226,960	90,460
80% HAMFI	491,255	328,830
100% HAMFI	No Data	530,075
Total	768,135	949,365

Table 30 – Housing Affordability

Data Source: 2007-2011 CHAS

NOTE: The data in the following table is not available at the state level. Therefore, this table will be left blank.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent					
High HOME Rent					
Low HOME Rent					

Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Wisconsin is experiencing a shortage of affordable rental and owner occupied units for low and moderate income households. This shortage is most severe among extremely low income renters. Respondents to the online public survey consistently ranked more affordable housing as a high priority. This need is backed up by data included in the housing needs assessment, which shows high percentages of low and moderate income Wisconsinites with a housing cost burden and severe housing cost burden. The loss of jobs and living wage jobs experienced during the 2007-2009 recession has depressed incomes and made it more difficult for low and moderate income Wisconsinites to find affordable housing. The tightening of credit which occurred after the housing crisis has also made it difficult for low and moderate income Wisconsinites to qualify for a home loan, leading some to stay in the rental market.

How is affordability of housing likely to change considering changes to home values and/or rents?

Rental Market:

Median contract rents have increased 26% between 2000 and 2010, from \$473 to \$596. During this time period, median household income has only risen 18% from \$43,791 to \$51,598. Because wages have not risen at the same rate as housing costs, households are spending a larger and larger percentage of their income on housing. In addition, the housing crisis has driven many households that would otherwise be homeowners into the rental market. This has increased competition for rental units and may have the effect of increasing rents charged by landlords. In some regions, especially those near growing metropolitan areas (Dane County, Milwaukee and its surrounding counties, and St. Croix County), rents can be significantly higher than the state median rent.

Owner-Occupied Market:

The value of many homes in Wisconsin took a hit during the housing crisis of 2006-2009. There is some evidence that the five year slide in home values experienced from 2008-2012 is reversing, with 2013 property values rising by 2.5%. This will increase the cost of housing, but may also help households struggling with underwater mortgages. In the aftermath of the housing crisis, credit has tightened, making it difficult for low income households or those with a large amount of debt to qualify for mortgages. This has made it challenging for some to purchase a home. On the other hand, interest rates are historically low, which makes the total cost of borrowing more affordable for those who can qualify

for a mortgage. Most economists predict that interest rates will rise over the next several years due to the strengthening economy and likely actions of the Federal Reserve. This will have the effect of increasing the total cost of borrowing.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

This data is not available at a state level.

Discussion

MA-20 CONDITION OF HOUSING – 91.310(A)

Introduction

The age of Wisconsin's housing stock poses significant challenges. Twenty nine percent of units were built before 1949. Structures of this age often have issues and are in need rehabilitation. As in the rest of the United States, renter-occupied units are more likely to be in need of rehabilitation than owner-occupied units.

Definitions

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation:"

When applicable, Division of Housing programs will use UPCS (Uniform Physical Condition Standards) starting 1/23/15 to determine if a housing unit/development is substandard under the new HOME rule.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	420,314	27%	300,451	43%
With two selected Conditions	9,044	1%	16,592	2%
With three selected Conditions	1,897	0%	1,767	0%
With four selected Conditions	281	0%	14	0%
No selected Conditions	1,143,183	73%	386,195	55%
Total	1,574,719	101%	705,019	100%

Table 32 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

The following table shows the age of Wisconsin housing stock. Wisconsin housing stock is older than that of the nation as a whole, with 29% of units built 1949 or earlier, compared to 22% in the nation as a whole. Both owner-occupied and renter-occupied housing stock is aging, though this varies by region.

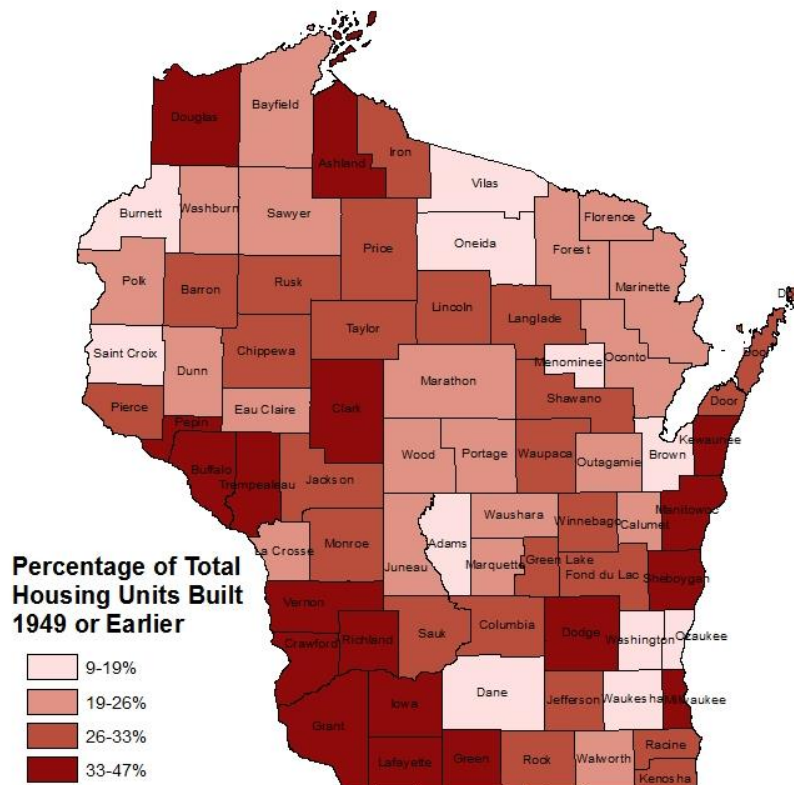
Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	207,042	13%	71,876	10%
1980-1999	366,974	23%	171,483	24%
1950-1979	584,056	37%	255,908	36%
Before 1950	416,647	26%	205,752	29%
Total	1,574,719	99%	705,019	99%

Table 33 – Year Unit Built

Data Source: 2007-2011 CHAS

Wisconsin's Aging Housing Stock

The following map shows the percentage of total housing units built in 1949 or earlier by county in Wisconsin. The areas with the largest percentage of aging housing stock are in the southwestern and rural Wisconsin. The areas with the “newest” housing stock are located in the growing metropolitan areas.



Risk of Lead-Based Paint Hazard

The following table shows the total number and percentage of units built before 1980, two years after lead based paint was banned in the United States. HUD estimates that three quarters of housing units built before 1980 contain some lead-based paint. Lead is a highly toxic metal that causes damage to the brain and vital organs. Children are especially susceptible to these issues, and may become lead poisoned by putting contaminated objects or paint chips in their mouth or playing in lead contaminated soil.

There is no reliable data for “Housing Units built before 1980 with children present”. According to DHS, statewide surveillance of childhood lead poisoning in Wisconsin has been conducted since 1991. During the years 2001 to 2013, the number of children tested for lead poisoning remained static from 2004 to 2006 at about 80,000 children per year and then increased in 2007 through 2011 to more than 100,000 children annually. Since then the number of children under age 6 tested for lead started to decline again. The time trend for the number of children found to be lead poisoned (10 mcg/dL) was on the decline from 2000 to 2013; however, looking at the number of children at the lower reference value (5 mcg/dL), the increase in the number of children is sizeable. Therefore, lead-based hazards continue to be of serious concern in Wisconsin and it is necessary to continue to explore opportunities to address lead-based hazards.

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,000,703	64%	461,660	65%
Housing Units build before 1980 with children present	-	-	-	-

Table 34 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

For each type of property, report the number of units suitable for rehabilitation and those not suitable for rehabilitation, based on the jurisdiction’s definition of “substandard but suitable for rehabilitation.”

NOTE: This data is not available at the state level

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

Wisconsin is experiencing a significant need for both owner and renter rehabilitation. This need is experienced across Wisconsin, but is most severe in northern and rural areas where the housing stock is the oldest. Respondents to an online public survey question asking about barriers to affordable housing mentioned a need for rehabilitation 54 times.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

There are approximately 2,286,000 households in Wisconsin. There are approximately 720,000 Wisconsin housing units built before 1950, of which approximately 500,000 have lead based paint hazards according to the Department of Health Services.

- According to “The Prevalence of Lead Based Paint Hazards in US Housing,” a study conducted by Jacobs et. al. in 2002, low to moderate income households are generally twice as likely as higher income households to live in dwellings with lead hazards.
- About 11% of Wisconsin households are extremely low income (less than 30% of the area median income). Of Wisconsin’s 250,000 extremely low income households, about 105,000 live in dwellings with lead-based paint hazards.
- About 275,000 Wisconsin households (12%) are low income (incomes between 30% and 50% of the median income) of which 115,000 live in dwellings with lead-based paint hazards.
- Approximately 526,000 (23%) of Wisconsin households are moderate income (incomes between 50% and 80% of the median income). Of these families about 220,000 live in dwellings with lead-based paint hazards.

Discussion:

MA-25 PUBLIC AND ASSISTED HOUSING – (OPTIONAL)

Introduction

The DOH Consolidated Plan details the public housing needs statewide, however entitlement cities and counties are required to submit their own five-year Consolidated Plans to HUD. Therefore, more entitlement city and entitlement county specific public housing data, conditions, revitalization needs, and strategies can be found in the entitlement cities' and counties' respective Consolidated Plans.

Total Number of Units

This table details the number of vouchers and accessible units by public housing program type administered by Wisconsin's 120 Public Housing Authorities. This table uses HUD's prepopulated data collected via Public and Indian Housing Information Center.

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	208	12,632	29,393	684	16,454	1,712	521	2,580
# of accessible units			2,295						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

There are 120 Public Housing Authorities in the State of Wisconsin; 58 provide low rent units, 24 provide Section 8 vouchers and 38 are combined low rent units and Section 8 vouchers. As detailed in the table above, there are a total of 29,393 Public Housing units in Wisconsin at 183 different Public Housing properties across the state and 2,295 units that are specifically designated as accessible units for the elderly and/or persons with disabilities.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

76 Public Housing Authorities provided narrative responses about the physical condition of their public housing units. The narratives were categorized into 6 categories (very good, good, fair, needs improvements, poor, aging). Some narrative responses fit into more than one category. 28 responded “very good”, 29 responded “good”, 15 responded “fair”, 19 responded “needs improvements”, 3 responded “poor”, and 24 responded “aging.” Two patterns emerged from the narrative responses. First, there are multiple Public Housing Authorities with “very good” or “excellent” housing stock. The second pattern was that many responded that their housing stock was built in 1965-1980 and, despite its age, was in good or fair condition.

HUD’s Real Estate Assessment Center conducts physical property inspections of properties that are owned, insured or subsidized by HUD. The Public Housing Physical Inspection Scores, compiled in 2011 which is the most recent data, indicates that Wisconsin has Physical Inspection Scores ranging from 100 (the best possible score) to 45, with an average score of 87.8. 103 Public Housing properties scored in between 90-100, 48 properties scored in between 80-89, and 29 properties scored 79 or below. This range of inspection scores demonstrates that the majority of Public Housing stock in Wisconsin is in good or very good condition. However, there are some properties that are in need of frequent inspection and in need of improvements.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

72 Public Housing Authorities provided narrative responses describing the restoration and revitalization needs of their public housing units, these responses were categorized into 17 categories. 33% (24 of the 72 Public Housing Authorities) responded that they did not have substantial restoration and revitalization needs of their public housing units, they explained that they keep their units up to date using Capital Funds and/or are able to update the units in between tenants. However, 66% (48) responded that they had restoration and revitalization needs and lack the funding necessary for updates – some in multiple categories. A common survey response was “we have more restoration and revitalization needs than we have funds for.” However, many Public Housing Authorities detailed very specific restoration and revitalization needs:

- 17 responded that their properties need new roofs,
- 14 need updated kitchens,
- 13 need updated sidewalks/parking/driveways,
- 13 need updated and/or energy efficient windows,
- 13 need updated appliances,
- 13 need new flooring or carpeting,
- 10 mentioned needing general repairs but lacking the appropriate funding,
- 9 need updated bathrooms,
- 7 need improvements to the exterior of their properties,
- 7 mentioned a need for A/C units,
- 7 have need for improvements to doors and locks/entry systems,
- 6 responded needing general interior improvements,
- 4 need plumbing updates,
- 4 mentioned an interest and/or a need for more funds to build or expand accessibility features in their rental units,

- 3 have landscaping needs,
- 2 do not have sprinkler systems and find that to be a safety hazard.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

See individual PHA Plans or entitlement city/entitlement county Consolidated Plans.

Discussion:

Introduction

Wisconsin's emergency shelter and homeless programs vary from community to community, reflecting individual local needs and resources. They are funded through a combination of local, state, and federal funds, and significant local private cash and volunteer contributions. Four homeless service task groups, known as Continuums of Care (CoC), coordinate local homeless housing and service activities and apply for HUD Continuum of Care Program funding. In addition, a number of the Wisconsin Community Action Agencies and other lead agencies coordinate smaller local CoCs for the purpose of Balance of State CoC governance and applying for Emergency Solutions Grant funding.

Nationally, the homeless service system is undergoing a paradigm shift from "housing readiness" to "housing first." Housing readiness is the idea that households should demonstrate that they are ready to be permanently housed by improving income, maintaining sobriety, and/or getting treatment. Housing first focuses on helping households first get into housing, with no conditions. This stems from the idea that it is easier for households to deal with underlying issues while in housing, rather than in shelter or on the streets.

An estimated 27,556 individuals were served by HMIS participating emergency shelters and transitional housing programs in 2013. HMIS participating emergency shelters provided 678,811 nights of shelter to 19,012 individuals and families in Wisconsin. This translates to an average length of stay of 36 days, which is an improvement over the average of 45 days recorded in 2009 for the previous Consolidated Plan. This improvement is likely related to the introduction of Rapid Rehousing, which seeks to quickly re-house homeless persons. High demand for shelter may also be causing high turnover, which would in turn shorten the average length of stay.

The following HUD table shows the housing inventory in Wisconsin. Permanent Supportive Housing, an evidence-based practice emphasized by HUD, is a growing program type in Wisconsin.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	1513	264	2194	1672	203
Households with Only Adults	1061	224	871	1112	6
Chronically Homeless Households	0	0	0	295	0
Veterans	35	0	376	606	90
Unaccompanied Youth	40	2	8	0	0

Table 37 - Facilities Targeted to Homeless Persons

The following table shows the total number of beds in Wisconsin CoCs and local CoCs in 2013, broken up by program type. Emergency shelters account for the largest portion of beds, followed by transitional housing and permanent supportive housing. There is a large diversity in the types of programs available in different Continua of Care. Larger urban continua contain the majority of permanent supportive housing. The service types in local CoCs tend to be dominated by emergency shelter and transitional housing, although there has been recent shifts from transitional housing models to rapid re-housing models.

Local CoC	Emergency Shelter Beds	Permanent Supportive Housing Beds	Rapid Re-Housing Beds	Safe Haven Beds	Transitional Housing Beds	Grand Total
BOS - Brown CoC	306	0	5	0	193	504
BOS - CAP CoC	69	0	0	0	86	155
BOS - Central CoC	93	0	32	0	57	182
BOS - Chippewa	17	28	0	0	105	150
BOS - Coulee CoC	146	107	15	0	175	443
BOS - Dairyland CoC	182	0	21	0	108	311
BOS - Fox Cities CoC	177	64	7	0	166	414
BOS - Indianhead CoC	81	0	0	0	9	90
BOS - Jefferson CoC	23	0	0	0	25	48
BOS - Kenosha CoC	89	0		0	99	188
BOS - Lakeshore CoC	118	0	0	0	67	185
BOS - North Central CoC	175	0	2	0	39	216
BOS - Northeast CoC	90	0	3	0	37	130
BOS - Northwest CoC	79	0	16	0	62	157
BOS - N*Wish CoC	81	0	3	0	49	133
BOS - Ozaukee	17	0	0	0	0	17
BOS - Rock Walworth CoC	210	114	50	0	257	631
BOS - Southwest CoC	122	0	0	0	61	183
BOS - Washington CoC	67	0	0	0	15	82
BOS - Waukesha CoC	155	94	11	7	43	310
BOS - West Central CoC	144	0	2	0	89	235
BOS - WinnebagoLand CoC	229	0	24	0	79	332
Racine CoC	193	126	0	0	112	431
Milwaukee CoC	740	1447	31	43	795	3056
Dane CoC	443	1025	0	14	314	1796
Totals	4046	3005	222	64	3042	10379

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Mainstream services are essential in moving individuals and families out of homelessness. A variety of mainstream services are available to Wisconsin residents, such as Medicaid, SSI, SSDI, SNAP, WIC, Federal-State Unemployment, Public Housing, Section 8, TANF, SCHIP (Badgercare), DVR, and Job Center services. Homeless service providers refer clients to mainstream services based on their needs. Homeless persons must qualify based on their income, disability status, and family composition. Representatives from state agencies involved in the provision of these services meet quarterly for Interagency Council meetings to ensure that services are coordinated in a way that best serves homeless persons in Wisconsin.

The PATH program provides funds to agencies for the purpose of outreach and providing mental health services to homeless persons with mental illness. A number of mental health services may be provided, including screening and diagnosis, community mental health, case management, alcohol and drug treatment, habilitation and rehabilitation, supportive and supervisory services in residential settings, and referral to other services such as health care. Wisconsin has eight PATH providers, located in areas which have a large population of homeless and persons with mentally illness.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

There are several types of programs dedicated to ending homelessness in Wisconsin. Providers were asked to rank program types in the DOH online public survey. The results are shown below, from highest priority to lowest priority.

1. Provide rapid re-housing assistance to those experiencing homelessness
2. Provide short term rental assistance to those at risk of homelessness
3. Provide transitional housing and services
4. Provide funding for emergency shelters
5. Expand permanent supportive housing
6. Provide street outreach

Emergency shelters provide physical shelter to homeless individuals and may consist of brick and mortar shelters, temporary shelters, or motel voucher programs. Many different types of shelters exist, from family shelters, to single men's shelters. Shelters differ widely in the amount of services offered, with some providing case management and supportive services aimed at getting homeless households housed, and others only providing a bed and a meal. Motel vouchers are used when shelters are full, or in communities that lack a fixed shelter. Shelters are often the first physical point of entry into the homeless service system. In the past 5 years

Safe Havens provide temporary shelter and services to clients with active mental illness. Participants typically come from the streets and represent the most hard to reach population. There are four safe havens in Wisconsin, located in Dane, Waukesha, and Milwaukee counties. Street outreach programs

make contact and build relationships with homeless persons on the street. These programs help unsheltered homeless persons connect to resources and enter safe and appropriate shelter and housing.

Homeless prevention programs seek to keep those facing an eviction housed. This is important in order to keep individuals and families from becoming homeless in the first place. Once households have an eviction on their record, it becomes more difficult for them to find a landlord willing to rent to them. Homeless prevention also helps households avoid the potential trauma and upheaval associated with an episode of homelessness. As with other types of prevention programs, there is some concern that funds could be spent on those who would never have become homeless, with or without the prevention assistance. In order to use prevention funds most efficiently, it is important that they are targeted towards households with the greatest need, who would actually become homeless without prevention assistance.

Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing in the private market. It often involves services to help the household search for and locate affordable housing, and a short to medium term rental voucher to help stabilize the household. HUD has recently emphasized rapid re-housing as an effective practice in reducing homelessness among families. Rapid re-housing has faced opposition in Wisconsin, due to the difficulty of restructuring existing programs and questions about program effectiveness. The ESG program recently required each grantee to have at least one rapid re-housing program as a condition of receiving dollars and encourages grantees to put increasing amounts of funding into rapid re-housing programs. Though this change is not yet reflected in the data above (the data was captured for calendar year 2013), it is likely that 2014 data will contain a larger number of rapid re-housing beds.

In the Division of Housing's online public survey, providers were asked to list the barriers that their community faces in implementing rapid re-housing. Eighty two respondents listed a lack of affordable housing or a lack of landlords willing to accept clients with barriers as hindering rapid re-housing programs. These responses point to a need for increased landlord education. Homeless service providers must establish relationships with local landlords to ensure the success of rapid re-housing programs. Providers also listed a lack of funds, and specifically, a lack of funds for staff and supportive services as hindering rapid re-housing programs.

Transitional Housing Programs are designed to provide a structured stay combined with services and case management for up to 24 months. HUD has encouraged providers to shift resources from transitional housing to rapid re-housing and permanent supportive housing as part of a system wide housing first approach. Wisconsin providers as a whole still have a large number of transitional housing beds, but have also created several new rapid re-housing programs in the past five years.

Permanent Supportive Housing provides housing and services designed to allow formerly homeless persons to increase their stability and skillset. It is targeted towards people who face barriers to permanent housing, such as a serious mental illness, substance abuse disorder, or chronic medical problems. National research shows that permanent supportive housing is a cost effective intervention for the chronically homeless population. Wisconsin does not currently have enough permanent supportive housing capacity to serve all chronically homeless persons. Many local Continuum of Care do not have any permanent supportive housing, but have a large chronically homeless population. Without permanent supportive housing, it is likely that chronic homelessness will continue.

In the online public survey, providers were asked to list barriers to the implementation of permanent supportive housing. The largest number of responses pointed to a lack of funding as the largest barrier

to permanent supportive housing. In addition, respondents indicated that community opposition and misconceptions about the homeless population has limited local funding and siting of permanent supportive housing.

MA-35 SPECIAL NEEDS FACILITIES AND SERVICES – 91.310(C)

Introduction

This section describes, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

HOPWA Assistance Baseline Table

This table shows the number and type of units available for people with HIV/AIDS and their families in Wisconsin. This data was gathered from HOPWA Consolidated Annual Performance and Evaluation Report (CAPER). The table shows that whereas 128 persons living with HIV/AIDS receive STRMU assistance.

Type of HOPWA Assistance:

- TBRA – Tenant-Based Rental Assistance (TBRA) units designated or available for people with HIV/AIDS and their families
- PH in facilities – Permanent Housing units in facilities designated or available for people with HIV/AIDS and their families.
- STRMU – Short-term, rent, mortgage, and utility assistance designated or available for people with HIV/AIDS and their families.
- PH placement – Permanent Housing placements are made for people with HIV/AIDS and their families.

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	0
PH in facilities	0
STRMU	128
ST or TH facilities	0
PH placement	0

Table 38 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Elders, frail elders, persons with disabilities:

The Department of Health Services provides a variety of information, services, and support regarding assisted living for elders, frail elders, and people with disabilities. Government entities such as Aging and Disability Resource Centers, the Board on Aging and Long Term Care, and Independent Living Centers (ILC) provide information and assistance for the elderly, the frail elderly, and people with disabilities. Wisconsin has online list serves of resources for elders, frail elders, and persons with disabilities; those include Senior DECISION, Housing and Architectural Accessibility Resources, and Assistive Technology Resources. The Department of Health Services also offers information on different types of community living arrangements including Community Based Residential Facilities, Residential Care Apartment Complexes, and Adult Family Homes. Additionally, County and Tribal Aging Offices can answer questions regarding elders, frail elders, and people with disabilities in their communities.

The Department of Health Services also provides Supported Living Programs, specifically for elders, frail elders, and people with disabilities. There are multiple programs – such as the Family Care Partnership Program, Money Follows the Person (MFP), Wisconsin Assisted Living Facilities and Programs, Community Options Program (COP), Community Integration Program (CIP), and Kate Beckett Program – that strive to foster people’s independence, increase their quality of life, and integrate them into their own homes and communities (or assist them in remaining in their community) while recognizing the need for independence and support.

Additionally, many of Wisconsin’s Public Housing Authorities have accessible Public Housing Units designed specifically for elders, frail elders, and persons with disabilities. Some also administer Housing Vouchers with a preference for elders, frail elders, and persons with disabilities.

Persons with Substance Use Disorders:

The Wisconsin Department of Health Services’ Division of Mental Health and Substance Abuse Services has programs to serve those who are dealing with substance use issues that continue to maintain a continuum of prevention and treatment services. Wisconsin’s prevention services include the Alliance for Wisconsin Youth Regional Prevention Centers, the Brighter Futures Initiative (comprehensive prevention and early intervention programming), Parents Who Host Lose the Most (evidence-based environmental efforts), and over \$5 million in Substance Abuse Prevention and Treatment Block Grants. In addition to State funds, Wisconsin relies heavily upon Substance Abuse Prevention and Treatment Block Grants and federal grants, such as the Access to Recovery, the Strategic Prevention Framework – State Incentive Grant, Brief Intervention and Referral to Treatment. Despite these resources, The Wisconsin Substance Abuse Prevention and treatment Block Grant Application noted that the access to behavioral health services is limited in Wisconsin’s rural areas where the demand for treatment exceeds availability of services. In addition to adult care, the Department of Health Services funds the “Anchorage program” which provides care for adolescents.

Comprehensive Community Services (CCS) is a state program that provides psychosocial rehabilitation services to citizens that have either an ongoing mental health or substance use need or both. Certified CCS Programs in counties and tribes offer services individualized for each adult and child with mental health or substance use conditions based on their choice. A voluntary program, consumers collaborate with members of their team in selecting services. CCS anticipates that providers will be trained in current best practices. Among current best practices are a few offered through Substance Abuse and Mental Health Service Agency (SAMHSA) that support both system and service practices that are researched and consistent with positive recovery outcomes.

Persons with HIV/AIDS and their families:

In addition to HOPWA grants, the AIDS Resource Center of Wisconsin has housing specialists on staff to assist with different housing challenges that HIV patients confront. Services that the AIDS Resource Center of Wisconsin administers are financial assistance, housing case management, intensive housing counseling, transitional residential housing, and family residential housing.

Victims of domestic violence, dating violence, sexual assault, and stalking:

The Department of Children and Families provides a variety of services to victims of domestic violence, dating violence, sexual assault, and stalking. The Department of Children and Families Domestic Abuse Program grant programs provide funding for basic services, children's programming, outreach, support services, tribal programming, programming targeted to refugee populations, and funding for training and technical assistance.

The Department of Children and Families Division of Family and Economic Security provides the following Temporary Assistance for Needy Families funded services to all eligible families, including those experiencing domestic violence:

- Wisconsin Works (W-2) – Provides assessment, employment planning and support, and case management; and in some cases, cash assistance to help families achieve self-sufficiency. All W-2 applicants are provided with educational information about domestic violence and the opportunity to discuss domestic violence related issues that make finding and keeping employment difficult.
- Emergency Assistance Program – Provides a cash payment for rent, security deposits or mortgage to eligible families experiencing homelessness or impending homeless or impending homelessness; Examples would be a family residing in a domestic violence shelter, or a family who may need to leave their current residence due to a domestic violence incident.
- Specialized training for W-2 case managers on assessment, communication and case planning with domestic violence victims.

Mental Illness:

Wisconsin has a county-based mental health system. The Wisconsin Department of Health Services (DHS) oversees a variety of community mental health programs through the county-based system through various survey and certification or prior authorization processes. Certified Outpatient Mental Health Clinics operate either publically or privately with the state providing the non-federal share to the Medicaid rate. Other programs such as Emergency Mental Health Programs or *Crisis Intervention* (24/7 phone, mobile and walk-in services); quasi Assertive Community Treatment (ACT) programs known as Community Support Programs (CSP); Comprehensive Community Services (CCS) are services counties and/or their contract providers can offer that provide behavioral health services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Elders, Frail elders, Persons with disabilities:

For over twenty years the Department of Health Services has assisted counties in relocating elders and people with physical and developmental disabilities residing in nursing facilities, Intermediate Care

Facilities for Individuals with Intellectual Disabilities, and State Centers for People with Developmental Disabilities into community-based settings. The Division of Long Term Care operates Medicaid Home and Community-Based Waivers, these waiver programs provide services to eligible frail elders and people with disabilities who meet the functional and financial program eligibility. These include: Family Care, Family Care Partnership, PACE (Program of All-Inclusive Care for the Elderly, IRIS (Include, Respect, I Self-Direct), Community Options Program Waiver, the Community Integration Program Waiver, the Nursing Home Diversion Program, and the Children's Long Term Support Waivers. These programs assist people who are leaving institutions to secure housing and services to ensure health and safety in the community. Statewide Aging and Disability Resource Centers provide information and assistance services to all elders and persons with disabilities, regardless of eligibility for Medicaid HCB services. This can include referral to a variety of housing resources in the community.

According to the SFY 2013 Report on Relocations and Diversions from Institutions, the Department of Health Services provides support to a limited number of individuals who are at imminent risk of entering a nursing home to be diverted from nursing home admission and remain in community settings. According to the Department of Health Services, in 2013, 558 elderly individuals and people with physical and developmental disabilities were provided relocation opportunities where they could live in community settings. Of these individuals, 368 were frail elders, 126 were persons with physical disabilities, and 64 were individuals with developmental disabilities.

Mental illness:

The Division of Mental Health and Substance Abuse Services works with county agencies that have referred individuals into facilities for treatment to assure their basic needs and mental health/behavioral health follow up care is provided in the community.

Individual Placement and Support (IPS) Supported Employment Programs for persons with severe and persistent mental illness in Wisconsin are dedicated to increasing employment and education opportunities for people with severe mental illness or co-occurring substance abuse disorders. Through the end of 2014, sixteen counties (Marathon, Lincoln, Langlade, La Crosse, Jackson, Monroe, Washington, Dane, Jefferson, Milwaukee, Dunn, Barron, Chippewa, Pierce, Outagamie and Washburn) have established IPS programs serving individuals in their Community Support Program and/or Comprehensive Community Support Program. At the end of the third quarter of 2014, an average of 40% of over 300 individuals in the program worked at some point during the quarter. During the baseline year of implementation, 2011, the quarterly rate was 18.5%. In 2015, the program plans continued expansion as community mental health programs expand statewide.

In 2013, Wisconsin Act 20 created the Office of Children's Mental Health (OCMH) as of January 2014. Reporting directly to the Governor's office OCMH will assure the coordination and integration of services across state agencies:

- Facilitating communication with all state agencies serving children, coordinating initiatives, and monitoring program performance focused on children's mental health.
- Supporting administrative efficiencies to allow for a reduction in duplication of efforts among state organizations devoted to children's programming.
- Improving access to appropriate services to children, focusing on children's services provided not only by DHS, but also the Department of Children and Families, Department of Public Instruction, the Department of Corrections, as well as other organizations serving children in the State of Wisconsin.

- The office is staffed by a Director appointed by the Governor, and three liaison staff.

Persons Discharged from Adult Institutions and Community Corrections:

According to consultation with the Department of Corrections, The Divisions of Adult Institutions and Community Corrections do not have specific policies that require or ensure that all persons releasing from an institution to community supervision have a residence and will not be homeless. However, they make every attempt to obtain housing for releasing individuals. These agencies pay close attention to the housing needs of certain specialty populations such as the mentally ill offenders, sex offenders and our veterans. The Division of Community Corrections funds/provides multiple housing options such as Halfway Houses, Community and Residential Programs, Transitional Living Placements, and emergency housing to assist offenders in addressing their housing and treatment needs, as well as to provide stability during their transition from incarceration to the community.

Discharge/release plans are developed approximately six months prior to release and are collaboratively crafted by Division of Adult Institutions social workers, Division of Community Corrections field agents, and offenders. Offenders are actively engaged in transitional preparation prerelease module completion which includes the development of a housing plan. Division of Community Corrections Agents review release plans and investigate the proposed residence for appropriateness. If the offender does not have appropriate housing available upon release, the agent may refer the offender to the housing options outlined above. The type of housing and prioritization of placement is determined based on the offender's risk to re-offend and their program/treatment needs.

The Division of Juvenile Corrections plans for the transition of youthful offenders to the community through the Joint Planning and Review Conference process. This planning team includes the Wisconsin Department of Corrections field and institution staff, family members, county representatives, the youthful offender, and representatives of any involved alternate care placement. This release/transfer plan is reviewed and revised throughout the institutional stay as the youth completes goals and objectives, new treatment needs arise, and other factors change. The goal of the Division of Juvenile Corrections is to place every youth under the age of eighteen in his or her family's home in order to maintain the family unit. However, if the youth is over the age of eighteen it may be in his/her best interest to pursue placement in an independent living setting. The Division of Juvenile Corrections is committed to funding Alternate Care Placements and Transitional Independent Living Programs as deemed appropriate by the Joint Planning and Review Conference.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Elders, Frail elders, Persons with disabilities:

The HOME Tenant Based Rental Assistance (HOME TBRA) program provides rental assistance lasting up to 24 months. HOME TBRA may only be provided to individuals and families with incomes below 60% CMI. Preferences can be made for special needs populations, as seen in 24 CFR § 92.209 (c) (2). Preferences allow HOME TBRA programs to serve high barrier populations who typically have trouble finding housing with the appropriate supportive services. The Division of Housing (DOH) HOME TBRA program targets individuals or families who are homeless or at risk of homelessness and have at least

one household member with a disability. Because HOME TBRA dollars cannot go to entitlement cities or counties, all grantees must be located in small cities and rural areas.

The SSI/SSDI Outreach, Access and Recovery (SOAR) program serves people who are homeless or at risk of becoming homeless and have a mental illness or a co-occurring substance use disorder. SOAR clients may include people who are homeless or who are returning to the community from institutions (e.g. jails, prisons or hospitals). The SOAR program helps increase access to mainstream government benefits, by expediting the entire SSI/SSDI application process. Case managers that work with the eligible population are trained in the “Stepping Stones to Recovery” course in which they learn the SOAR technique for writing and submitting effective applications in an expeditious manner. Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) are disability income benefits administered by the Social Security Administration (SSA), which also provide Medicaid and/or Medicare health insurance to individuals who are eligible.

The process to apply for SSI/SSDI is complicated and extremely difficult to navigate. Nationally, only about 29 percent of individuals who apply for these benefits are approved on initial application, and appeals take an average of *one year* to complete. For those who have a mental illness, substance use issues, or co-occurring substance use disorders that impair cognition, the application process is even more difficult. Approval on initial application for people who are homeless and who have no one to assist them is only about *10-15 percent* – yet accessing these benefits is often a critical first step in recovery and ending homelessness. Securing SSI/SSDI benefits for Wisconsin’s people who are homeless, or at risk of homelessness and have a mental illness or a co-occurring substance use disorder, not only confers an added quality of life for the client, but reduces the overall program cost associated with serving this population (e.g., shelter stays, incarceration, emergency department visits, and hospitalizations). The current DOH-funded agencies have an average success rate of about 72% upon initial submission of an SSI/SSDI application.

Persons with Substance Use Disorders:

In order to work to improve the understanding about mental and substance use disorders, to promote emotional health and the prevention of substance abuse and mental illness, increase access to effective treatment, and support recovery, Wisconsin committed to a reasonably good fit between Substance Abuse and Mental Health Services Administration’s Strategic Priorities and Wisconsin priorities, indicators, and program initiatives. A 3-year plan was developed, as part of the Substance Abuse Prevention and Treatment Block Grants application, which addressed twelve priorities involving systems improvement and specific initiatives. Of the twelve emphasis areas, there are some initiatives that are directly relevant to housing and community development, those are: Workforce Development initiatives, improve diversity efforts to enhance activities with special populations, integration of mental health and substance use disorders in primary health care, and improve treatment across the lifespan for effective age-specific intervention and treatment. Additionally, a July 2010 – June 2014 Strategic Plan was created by the State Council on Alcohol and Other Drug Abuse and can be found here: <http://www.scaoda.state.wi.us/strategicplan.htm>.

As American Indian and Alaska Native Tribal governments are sovereign governmental entities, Wisconsin has an active partnership with eleven federally recognized Wisconsin tribes called the Tribal State Collaborative for Positive Change which is supported through system change efforts in the Community Mental Health Services Block Grant and the Wisconsin Native American Prevention Counsel,

and funded with the Strategic Prevention Framework-State Incentive Grant. The Tribal State Collaborative for Positive Change is a viable avenue for training, feedback, dialogue, and collaboration and Wisconsin believes that more deliberate efforts toward this collaborative role are needed to address issues of alcohol and drug addiction in Wisconsin. Department of Administration staff also participate in the DOA Annual Tribal Consultation meeting with representatives of Tribal governments.

Persons with HIV/AIDS and their families:

The Division of Housing will continue to administer the state HOPWA grant. Assistance is provided as follows: approximately 40 percent for rental assistance, approximately 30 percent for housing counseling, approximately 20 percent for supportive services associated with housing, 7 percent for project sponsor administration and 3 percent for the Division of Housing.

Substance Abuse Prevention and Treatment Block Grants funds continue to fund HIV prevention education services targeted towards substance abusers and their sexual and/or needle sharing partners living in the Milwaukee, Wisconsin area. This service was contracted through the Wisconsin Division of Public Health's HIV Prevention Program.

Victims of domestic violence, dating violence, sexual assault, and stalking:

Department of Children and Families recommendations to meet the critical needs of Wisconsin citizens include, Domestic Violence:

- Continued stable funding for domestic abuse shelters as a critical, live-saving, and confidential safety net for survivors who need an immediate safe haven from an abuser;
- Programming that can get survivors quickly into safe, affordable, and permanent housing, when appropriate, while continuing to provide survivor-driven advocacy services that address barriers and challenges.

This paired model has had significant success rates in reducing homelessness and increasing safety.

The Wisconsin Governor's Council on Domestic Abuse developed the *2014-2020 Long Range Plan for a Safe Wisconsin* which aims to end domestic abuse in Wisconsin. The plan outlines six main priorities: 1) Maintain, strengthen and expand core services, 2) enhance services and prevention education for children and youth, 3) strengthen outreach and education to Wisconsin communities, 4) expand programming that is community driven in culturally-specific and lesbian, gay, bisexual, or transgender (LGBT) communities, 5) address the civil legal needs of domestic violence victims and their children, and 6) focus on promising strategies and practices.

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing varies widely throughout the State and is typically affected by local policies over which the state has little control. Wisconsin's tradition of "home rule", embodied in the State Constitution, means that municipalities control most zoning and land use decisions (the siting of community residential facilities and environmental regulations are exceptions). The concern is that "home rule" allows communities to use ordinances to keep affordable and multifamily housing—frequently the routes by which lower-income, often minority, households enter a community—from being developed.

In addition, the use of impact fees for new development raises the cost of new housing and increases the value of existing housing, thus generally reducing affordability. For example, a number of communities in Wisconsin, particularly in suburban areas around larger cities, impose impact fees on new residential development in the effort to cover broad-based costs for improvements and public facilities that can (potentially) slow down a boom in new housing starts. The State Legislature, in 1994, passed an act to develop more regularity in impact fees across its communities, with an allowance made for communities to waive impact fees for low-income housing. Other steps have been taken as well in fast-growth areas, such as increasing lot sizes and setbacks and establishing minimum square foot requirements for new residences. The state's "home rule" provisions mean that zoning ordinances are left to the judgment of local governments. The net effect of these local actions could make housing more expensive than might be the case without the new fees and regulations.

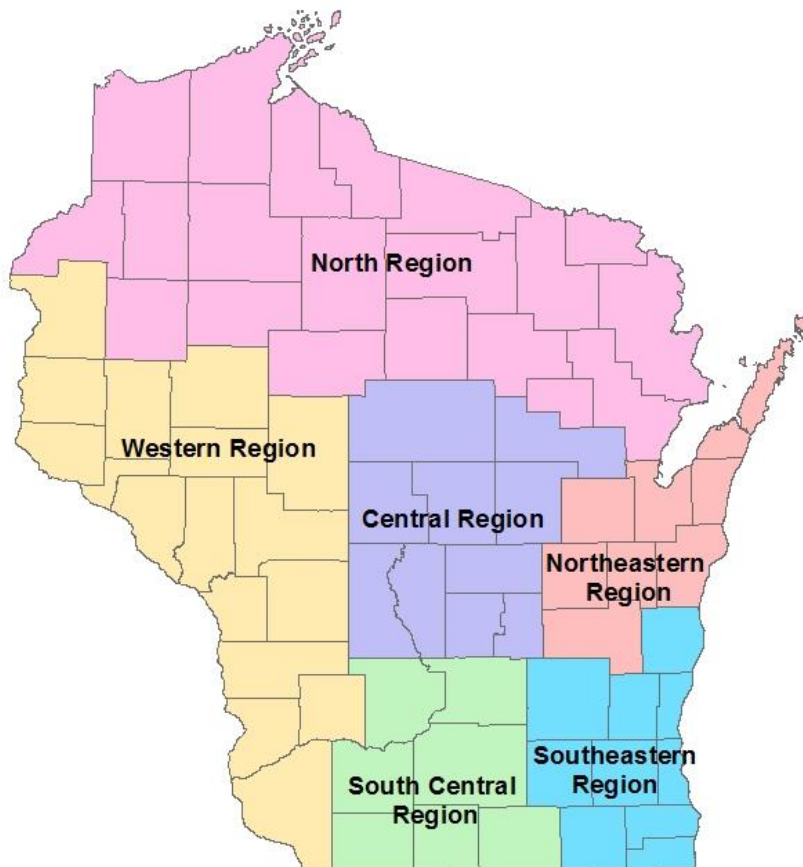
An extended analysis of the impact of state laws and regulations upon affordable and fair housing in Wisconsin can be found in DOH's Analysis of Impediments to Fair Housing Choice. Topics covered that may include analysis of the effects of public policies on affordable housing include:

- Local Land-Use Regulations
- Blighted area, urban redevelopment, and urban renewal laws
- Local housing authority laws
- Comprehensive planning laws
- Tax incremental financing laws
- Zoning laws
- Impact Fees
- WHEDA statewide tax deferral and abatement programs
 - Property tax deferral program
 - Homestead credit
 - Supplement to the federal historic rehabilitation credit

Introduction

This section analyzes Wisconsin's non-housing community development and economic development needs. Measuring Wisconsin's economic conditions is difficult as many of the state's economic characteristics – for example, HUD's categories: business by sector, labor force, occupations by sector, and educational attainment – vary by geographical region.

For the sake of analyzing data in this Non-Housing Community Development Assets Market Analysis section, the Division of Housing has divided Wisconsin's CDBG program into six geographical regions, which are: Central, Northeastern, North, South Central, Southeastern, and Western. The CDBG-ED program does not use a regional approach like the CDBG-Housing regions. However this Consolidated Plan divided state data into regions to better organize community development and economic development data. This approach allows for an analysis of data specific to the State of Wisconsin as well as data specific to Wisconsin's different geographical regions. Note that entitlement counties (Dane, Waukesha, and Milwaukee Counties) and cities (Appleton, Beloit, Eau Claire, Fond Du Lac, Green Bay, Janesville, Kenosha, La Crosse, Madison, Milwaukee, Neenah, Oshkosh, Racine, Sheboygan, Superior, Waukesha, Wausau, Wauwatosa, West Allis) are not included in this data. The map below shows the borders of these geographical regions.



note: Entitlement counties (Dane County, Milwaukee County, and Waukesha County) and cities (Appleton, Beloit, Eau Claire, Fond Du Lac, Green Bay, Janesville, Kenosha, La Crosse, Madison, Milwaukee, Neenah, Oshkosh, Racine, Sheboygan, Superior, Waukesha, Wausau, Wauwatosa, West Allis) are not included.

The following table provides data regarding the major employment sectors of Wisconsin. The data was prepopulated by HUD, and contains errors in the “Number of Jobs, Share of Jobs, and Jobs Less Workers” columns. The data in the “Number of Workers” and “Share of Workers” columns is correct, and was populated by the Division of Housing using the 2007-2011 American Community Survey.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	70,734	20,524	3%	2	1
Arts, Entertainment, Accommodations	237,538	108,694	8%	12	1
Construction	165,937	40,730	6%	4	0
Education and Health Care Services	639,732	135,787	22%	15	-2
Finance, Insurance, and Real Estate	180,467	46,086	6%	5	-1
Information	53,867	13,557	2%	1	0
Manufacturing	530,612	243,102	19%	27	3
Other Services	116,373	33,171	4%	4	0
Professional, Scientific, Management Services	223,502	39,233	8%	4	-2
Public Administration	100,287	10	4%	0	0
Retail Trade	327,344	133,985	11%	15	1
Transportation and Warehousing	130,954	45,592	5%	5	1
Wholesale Trade	82,578	50,445	3%	6	0
Total	2,859,925	910,916	--	--	--

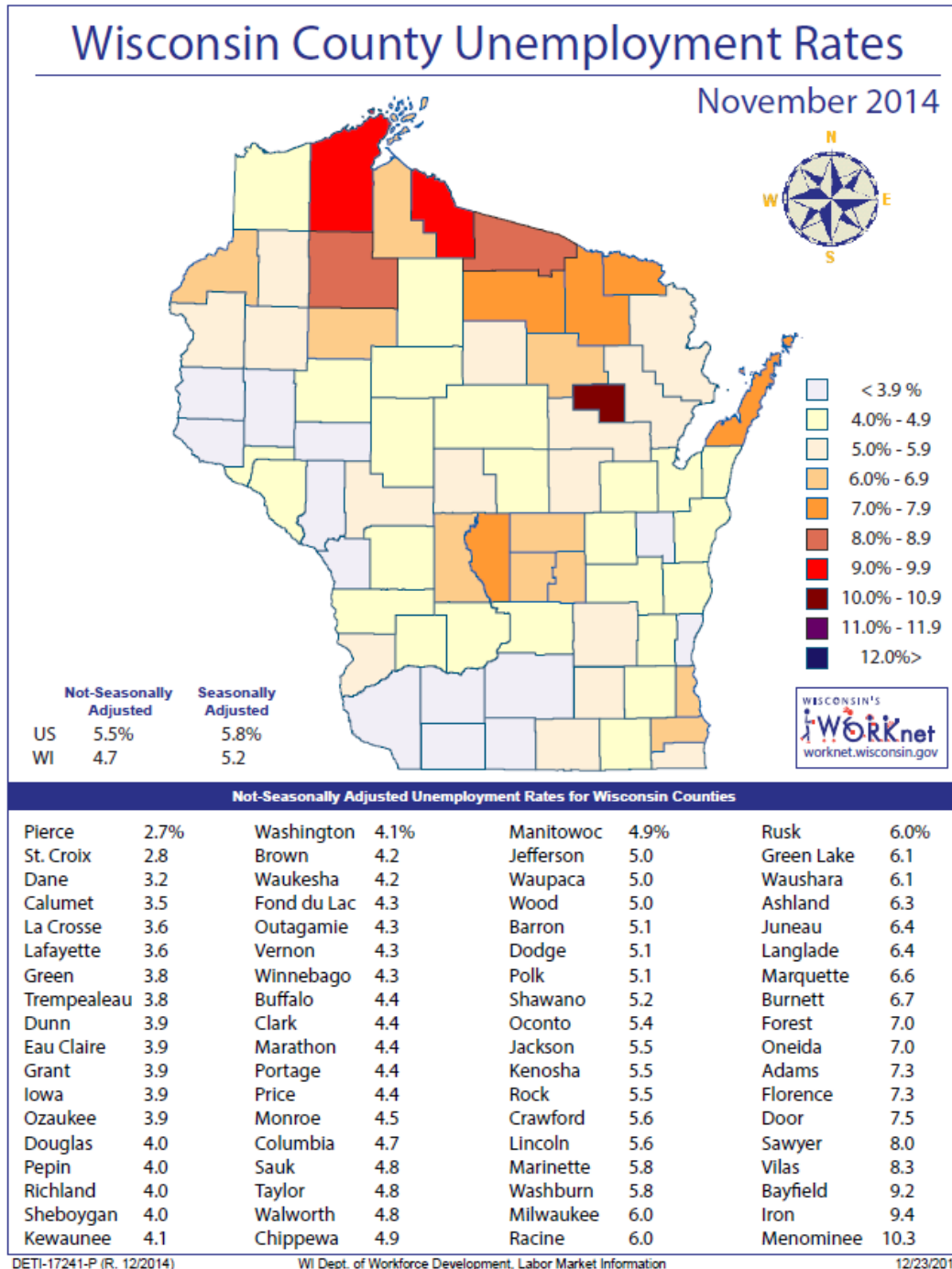
Table 39.1- Business Activity

2012 American Community Survey (ACS), 2008-2012 Longitudinal Employment Data (LED)

Data source:

Labor Force

The map below presents the state's unemployment rates by counties as opposed to the previous regional grouping. This county unemployment map shows that the North region has six of the state's top ten counties with the highest rate of unemployment.



The following table offers a snapshot of unemployment rates in the non-entitlement areas of Wisconsin as self-reported by the 2007-2011 American Community Survey. It is important to note that this survey data encompasses a five year period, and therefore does not provide a full picture of the volatility of the unemployment rate. Wisconsin's highest unemployment rate during this period was 9.2% in June 2009. The current (November 2014) Wisconsin unemployment rate is 5.2%. Though this unemployment rate is lower than the current national average of 5.8%, some regions have shown trends of higher unemployment than the state and the nation as a whole. It should be noted that, according to the U.S. Bureau of Labor Statistics, the quarterly unemployment rate was 11.1 % for people with disabilities compared to 5.2% for workers without disabilities for the fourth quarter of 2014. This shows that people with disabilities disproportionately experience unemployment compared to people without disabilities.

Note: please see Travel Time tables immediately following Labor Force for further consideration of analysis.

Civilian Labor Force

	State	Central	North-eastern	North	South Central	Southeastern	Western
Total Population	1,648,864	254,499	479,635	220,207	194,150	1,232,749	409,505
Employed Population 16 years and over	1,549,762	235,941	449,661	203,233	179,932	1,133,379	384,261
Unemployment Rate	7.14%	7.29%	6.25%	7.71%	7.32%	8.06%	6.16%
Unemployment Rate for Ages 16-24	20.06%	20.90%	17.38%	21.17%	20.49%	22.17%	16.29%
Unemployment Rate for Ages 25-65	4.95%	4.89%	4.43%	5.23%	5.24%	5.52%	4.36%
Unemployment Rate for Over Age 65	.75%	.99%	.66%	.65%	.77%	.83%	.59%

Travel Time

The following table shows travel times in different regions of the state. The Northeastern region of the state has the biggest population of workers that commute the shortest distances to work. Stakeholders report that transportation access is a barrier to employment for the underemployed and unemployed in both rural and urban areas.

	State	Central	North-eastern	North	South Central	Southeastern	Western
Total Population	2,692,677	221,061	425,726	188,210	425,261	1,075,608	356,811
<30 Minutes	1,991,092 (74%)	169,386 (77%)	346,159 (81%)	141,724 (75%)	314,796 (74%)	759,290 (70%)	259,737 (73%)
30-59 Minutes	576,945 (21%)	40,870 (18%)	65,481 (16%)	35,995 (19%)	92,283 (22%)	266,059 (25%)	76,257 (21%)
60 or More Minutes	124,640 (5%)	10,805 (5%)	14,086 (3%)	10,491 (6%)	18,182 (4%)	50,259 (5%)	20,817 (6%)

Occupations by Sector

The following table shows the distribution of workers within specific occupations in Wisconsin.

	State	Central	North Eastern	North	South Central	Southeastern	Western
Management, business and financial	614,031 (21%)	41,698 (17%)	88,854 (20%)	34,826 (17%)	32,817 (18%)	254,826 (22%)	75,825 (20%)
Farming, fisheries and forestry occupations	110,322 (4%)	8,853 (4%)	16,161 (4%)	6,538 (3%)	6,254 (3%)	47,085 (4%)	13,968 (4%)
Service	298,087 (10%)	26,559 (11%)	47,518 (11%)	23,954 (12%)	19,220 (11%)	113,600 (10%)	43,041 (11%)
Sales and office	692,551 (24%)	55,360 (23%)	110,021 (24%)	44,300 (22%)	43,667 (24%)	287,022 (8%)	87,676 (23%)
Construction, extraction, maintenance and repair	249,956 (9%)	24,260 (10%)	40,200 (9%)	25,470 (13%)	19,911 (11%)	85,109 (8%)	39,238 (10%)
Production, transportation and material moving	132,743 (5%)	19,835 (8%)	36,545 (8%)	18,611 (9%)	15,357 (9%)	77,162 (7%)	31,374 (8%)

Table 40 – Occupations by Sector

Data Source: 2012 ACS

Education:

The following table shows employment by educational attainment. Regional data followed the same trend as the state data, and was therefore not included.

Educational Attainment by Employment Status (Population between 25 and 64)

Educational Attainment Wisconsin - Statewide	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	130,864	21,530	83,147
High school graduate (includes equivalency)	693,295	57,086	184,208
Some college or Associate's degree	786,161	48,545	149,984
Bachelor's degree or higher	721,929	21,520	102,983

Table 41 - Educational Attainment by Employment Status

The following table shows Educational Attainment by Age in Wisconsin. Regional Data is shown in the following pie charts.

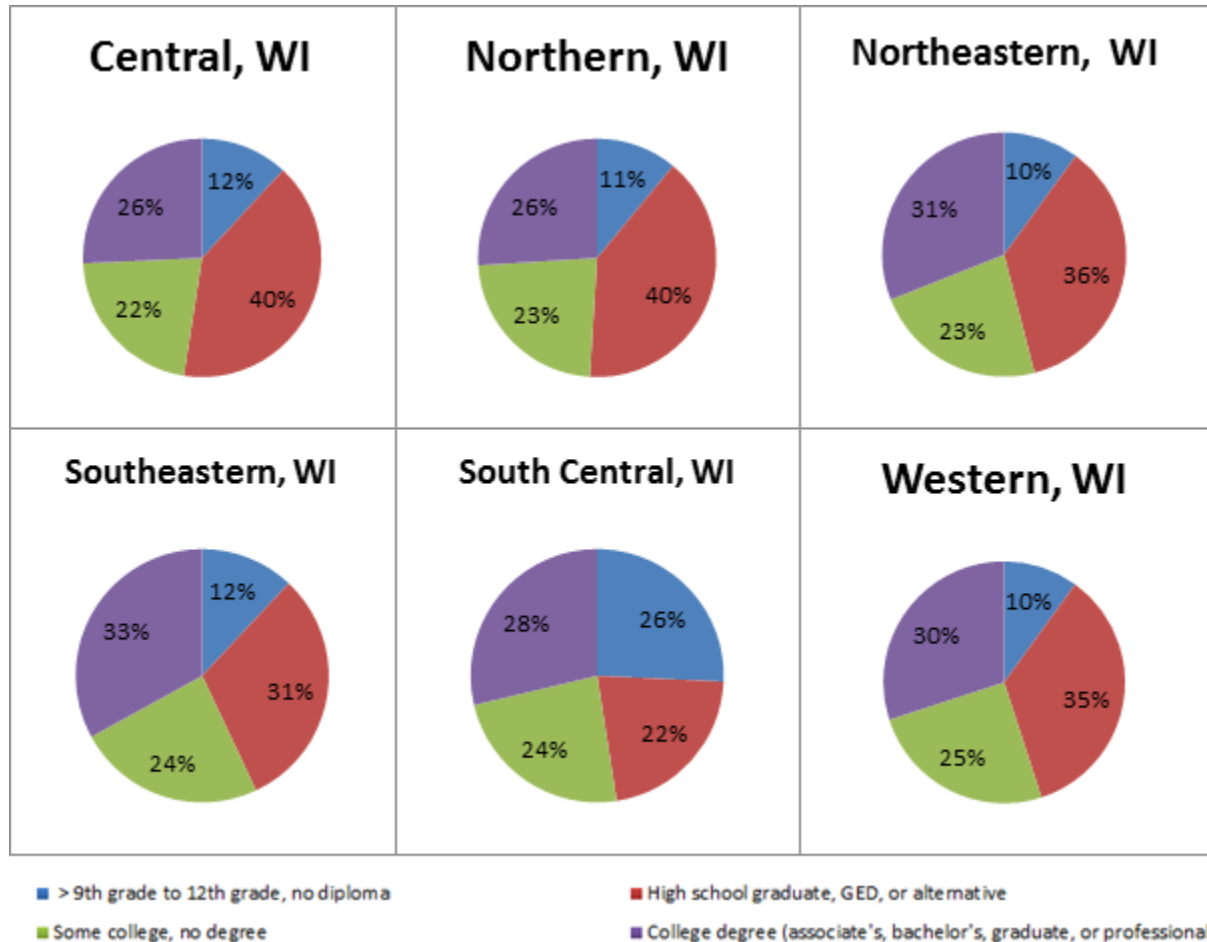
Educational Attainment by Age

Educational Attainment by Age Wisconsin - Statewide	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	8,744	16,193	17,337	30,830	69,555
9th to 12th grade, no diploma	63,689	44,875	42,943	83,368	79,362
High school graduate, GED, or alternative	178,976	188,490	209,745	536,740	334,161
Some college, no degree	228,640	168,543	168,543	338,106	122,084
Associate's degree	24,605	78,255	84,068	154,578	27,440
Bachelor's degree	47,415	161,266	154,660	256,014	79,063
Graduate or professional degree	2,663	53,264	73,055	149,285	55,362

Table 42 - Educational Attainment by Age

Data Source: 2012 ACS

In all regions except for South Central, 30 - 40% of the labor force has a high school diploma or an equivalent degree. In all regions, at least 50% of the labor force has some college or a post-secondary degree. Industries are reporting that there is a lack of education for jobs that they have available. Another concern of some residents is that workers who have the educational capacity to perform specific job tasks are not being provided with the necessary training opportunities.



Percentage of Wisconsin's Total Degrees by Region

The following chart shows the percentage of degrees obtained in each region and its corresponding per capita income.

Region	Percentage of Total Degrees	Per Capita Income
South Central	6%	42,368
Southeastern	48%	42,068
Northeastern	17%	38,965
Central	8%	35,731
Western	14%	35,246
Northern	7%	33,741

Educational Attainment – Median Earnings in the Past 12 Months

The following table shows median earnings by educational attainment for Wisconsin.

Note: no additional tables needed for regions.

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,778
High school graduate (includes equivalency)	28,803
Some college or Associate's degree	33,770
Bachelor's degree	46,161
Graduate or professional degree	59,944

Table 43 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

The three leading employment sectors for the State of Wisconsin are Education and Health Care Services, Manufacturing, and Retail Trade. These three sectors employ a combined 52% of the Wisconsin labor force. The Information sector is the smallest.

Describe the workforce and infrastructure needs of business in the state.

The state's skilled industries report workforce deficits. Though it is unclear whether these deficits are due to a skills gap (in either quantity and/or quality) or other factors, Wisconsin's work force may need to adapt to changing demands. According to the Department of Workforce Development (DWD), employers from every industry and key occupation consistently say they are looking for skilled workers.

Skilled workers are at a premium and, consequently, employers aggressively recruit talent from the same labor pool. More employers have indicated that they are adopting incumbent worker training programs to "up-skill" their existing workforce. Others are implementing retention programs to retain skilled workers. Still, many employers continue to express frustration over challenges associated with the recruitment and retention of workers who have the skills needed to fill openings. This challenge will become greater as Boomers age and retire and the labor force participation rate continues to trend lower. This situation was not unexpected. The trends were visible in the late 1970s and were beginning to be felt the late 1990s. Two recessions alleviated the confluence, but now fifteen years later, the Boomers are leaving the workforce in larger numbers (e.g. first Boomers were born in 1946 and turned 65 in 2011). Our projections for Wisconsin's workforce show essentially no growth by 2030 – fifteen years from now. The sheer size of the Boomers segment will overtake population growth (natural or migration) in the upper Midwest in the foreseeable future. One response by employers has been to recruit as many workers as possible, including those with skills other than those the employer needs, and train them to their individual maximum potential. While this addresses the near term it is expensive.

Some state and private agencies report that transportation is a growing need, and is cited as a barrier to reaching full employment. Data from the American Census Survey shows no evidence that travel times have increased in 2007-2011 data, but data does show that regional job growth has expanded in some areas while declining in others. On average, 16-25% of workers travel 30-59 minutes to work while 3-6% travel over 60 minutes to work. Individuals with lower incomes have disproportionate transportation needs, it is therefore important that barriers to transportation be addressed so that workers have access to employment centers. Studies have shown that improvements to infrastructure have a direct correlation to job growth. People experiencing housing vulnerability, for example veterans, victims of domestic abuse, and persons with disabilities, need of supportive services to increase the feasibility of attaining and keeping employment.

The Division of Housing conducted an online public survey in which residents expressed a desire for DOH to "support projects that attract new jobs and create jobs by expanding businesses." The results also showed that there is a desire for "community development funds to be directed towards spurring new investment." A large portion of participants mentioned a need for more jobs, emphasizing a need for jobs that paid a living wage.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The state's workforce is not meeting the rapid growth of needs in the skilled job market because either skills are not adapting or this is due to other barriers. Worker income tends to rise with educational attainment. While growth is needed in some areas to increase employment opportunities, educational outcomes may need to be improved so that workers have the skills and degrees needed to apply for higher income jobs. For the most part, the regions with the lowest rates of high school and college graduates also have the lowest per capita income and highest amount of unemployment and/or poverty. Many skilled workers are aging out of the workforce and industry data shows that these positions are difficult for employers to replace.

Helping low-income entrepreneurs in the development of very small businesses, or microenterprises, is a strategy for combating poverty and promoting economic development in across the State of Wisconsin. A microenterprise is a commercial enterprise with five or fewer employees (including the owner of the business) where the owners are working toward developing a business. The owner family's income must be in the low to moderate range. The Microenterprise Program can provide financial and technical assistance, training and general support services such as childcare and transportation to the owner. According to the Corporation for Enterprise Development, "Microenterprise ownership increases income for poor households, helps those families and individuals move out of poverty and off of public assistance, and helps them build both business equity and personal assets over time." Research and analysis conducted by the Aspen Institute has concluded that microentrepreneurs create jobs not only for themselves, but for others as well, making microenterprise development an important and cost-effective tool, especially for more disadvantaged communities. Microenterprises require access to credit to meet a variety of business needs, including: working capital, purchase of supplies, inventory, or equipment as well as debt refinancing.

Microenterprise revolving loan funds are an important tool for filling the gaps in private capital markets. They meet the demand for micro business loans in under-served urban and rural markets across the state by financing businesses that do not qualify for conventional bank loans. Low-income business owners may find it difficult to get approved for conventional business loans because of a perception that their ventures are too high risk. Yet microenterprise development can be a cost-efficient to support the local economy and the majority of microenterprise development loan funds have been shown to have reasonably low default rates. The Division of Housing recognizes that microenterprises are an important part of the state's economy, and microenterprise revolving loan funds are an appropriate and effective way of supporting them. During 2015, a revolving loan fund microenterprise program will be developed by the Division of Housing.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

According to the Department of Workforce Development (DWD), some employers are saying that the lack of skilled workers is constraining their ability to increase business or market share. They are also "modernizing", e.g. buying the latest technology, to automate operations and reduce operating costs to stay competitive while supplanting the dependency upon skilled workers. This approach often brings new labor issues, i.e. finding technology fluent employees or matching existing workforce with technology requirements. This is not a new phenomenon, but the speed of technological advancement coupled with the slowing growth of the workforce has combined to make it an acute problem in certain regions and industry sectors.

A skills gap has been reported by some stakeholders as hindering efforts to hire new workers and expand businesses. Job training and apprentice programs work to educate new workers, but the need exceeds the availability. However, some agencies that serve populations experiencing unemployment are located in areas that are not within reasonable travel distances for those without access to transportation. The Office of Economic Advisors (OEA) reported on the "Outlook for Wisconsin's Workforce" in June 2014, they found that the five most common job openings (meaning both turnovers and new jobs created) are: cashiers, food preparation and serving, retail salespersons, waiters and waitresses, and registered nurses. The five most common job openings reported by Wisconsin Job Centers are: customer service representatives, production workers, personal care aides, registered nurses, and food preparation and

serving workers. The five most challenging positions to fill, according to the OEA report, are: food preparation and serving workers, registered nurses, customer service representatives, heavy truck drivers, and nursing aides. The report also noted that Manufacturing Occupations were in high demand in Wisconsin, but particularly in Northeastern Wisconsin. A variety of education and/or training is required for these occupations, however according to an analysis of 18,000 jobs profiled from 2006-2010 ACXT JobPro Database, essential skills identified statewide are: locating information, reading for information, applied mathematics, workplace observation, teamwork, writing, applied technology, listening, and business writing.

Workforce strategists are now adopting "demand-driven" models to enable employers to direct targeted education and training initiatives. An example would be Governor Walker's Wisconsin Fast Forward initiative, where employers, educators and workforce partners define training programs and apply for state grants to develop and deliver training to unemployed, under-employed or incumbent workers. Employers are actively collaborating to access or develop the skilled talent required to sustain and grow their business. Initial success with the initiative has led to the Governor's \$35.4 million expansion of the program as part of his Blueprint for Prosperity initiative to include school-to-work programs for high school pupils, programs supporting the employment of persons with disabilities, and efforts to address Wisconsin Technical College wait lists.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Wisconsin has workforce training initiatives sponsored through programs administered by the Department of Workforce Development (DWD), the University of Wisconsin system, and the Workforce Investment Board. These programs increase workers' skills and assist in strengthening the state's economy. Improved skill sets, industry growth, and worker retention are critical to developing strong communities.

In accordance with statewide goals, DWD has initiated training programs that assist people vulnerable to unemployment. The Wisconsin Youth Apprenticeship program, which is a part of the statewide School-to-Work initiative, is designed for high school students who want hands on learning in an occupational area at a worksite to acquire job skills that prepare them for employment while still earning their high school diplomas. DWD works with other agencies that focus on special needs populations to increase employment prospects for those groups. In conjunction with the Department of Veteran Affairs, DWD offers several workforce opportunities for veterans: training, financial assistance with licensure, and encouraging employment by the private sector. The Department of Vocational Rehabilitation offers the Wisconsin Promise, Blueprint for Prosperity, and other grant programs to help train persons with disabilities giving them the necessary skills for employment. Apprenticeship programs that cater to low income workers are also provided. These programs are just a handful of the programs that exist alongside and under the Wisconsin Fast Forward initiative, aimed at increasing workforce development, signed into law by Governor Scott Walker.

Describe any other state efforts to support economic growth.

- New Markets Tax Credits, distributed by the Wisconsin Housing and Economic Development Authority (WHEDA), serve as a resource to help fuel job creation and economic development efforts by promoting equity investment in low-income urban and rural communities.
- In July 2014, the Historic Tax Preservation credit was reinstated and doubled, allowing for additional financial assistance to entities willing to utilize historic areas throughout the state for their business endeavors.
- Grants to increase the Science, Technology, Engineering, and Mathematics program (STEM) in K-12 education have been increased.
- Increased focus on improving major transportation routes throughout major employment sectors.
- Providing subsidies to low-income populations to gain access to broadband services.
- Governor's Council on Domestic Abuse created to assist in the prevention of domestic violence and the consequences stemming from it to better serve the employment needs of survivors.
- Through initiatives put forth by the Department of Natural Resources (DNR), the state offers the Safe Drinking Water Loan Program (SDWLP) and Clean Water Fund Program (CWFP). A small portion of the loan awards are principal forgiveness loans and do not have to be repaid. These programs help prevent the serious health and environmental hazards that lead to health problems that keep people out of work.
- The Department of Veteran's Assistance offers the Veterans Housing Program which provides job training.
- Wisconsin Economic Development Corporation (WEDC) provides programs such as Capital Catalyst, Seed Accelerator, Special Project Loan Fund and the Business Opportunity Loan Fund helping establish gap financing to entrepreneurs and businesses that are looking to invest.
- The following programs are offered by the Department of Workforce Development (DWD):
 - **Federal Workforce Investment Act (WIA):** This program provides funding in three categories, Adult, Dislocated Worker, and Youth. The Adult and Youth programs focus on low income customers and, for those deemed eligible, funds can provide training and employment assistance to get customers employed or re-employed.
 - As of July 2015, this initiative will be superseded by the newly passed Federal Workforce Innovation and Opportunity Act (WIOA). According to the Department of Labor's website, "WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy."
 - **Federal Wagner Peyser Act:** A primary function is to support the public labor exchange to match job seekers and employers. Staff provide a wide range of job seeking assistance including: helping with resumes, helping with interview skills, referral to other services, and providing intake services to determine programs for which they may qualify.
 - **Job Centers:** In conjunction with the Department of Workforce Development, a variety of employment and training agencies come together to provide coordinated services to a wide range of job seekers and employers.

Discussion

The programs enacted by the state show great promise, but focus may need to be redirected to areas that perform below the baseline for maximum growth/economic potential. Transportation, skills improvement and education, and other factors that may be limiting job hiring need to be explored to determine their impact on the economic/community development needs of the state. Education, income, and employment gaps are widening in Wisconsin's rural areas.

MA-50 NEEDS AND MARKET ANALYSIS DISCUSSION

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

This Consolidated Plan is for a state grantee. Wisconsin has multiple and varying housing and non-housing challenges, which vary from region to region. Projects and activities funded through the Division of Housing's method of distribution are selected to meet local market needs and the Division of Housing's goals and strategies.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The Consolidated Plan is for a state grantee. Wisconsin's diversity varies by region, and there are numerous areas across the state with concentrated populations, including African American, Hispanic, Asian, and others. The needs of these populations vary based on the region. The Division of Housing's methods of distribution are designed to be flexible enough to address the needs specific to each local market.

What are the characteristics of the market in these areas/neighborhoods?

Not applicable.

Are there any community assets in these areas/neighborhoods?

Not applicable.

Are there other strategic opportunities in any of these areas?

Not applicable.

Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in Wisconsin to meet housing, business, and infrastructure needs caused by the disasters. The Division of Housing estimates that 20 housing units and 14 public facility/infrastructure projects are still in need of CDBG-DR assistance. Extensive information about disaster recovery needs can be found in the CDBG-DR Action Plans on the Department of Administration Division of Housing website.

STRATEGIC PLAN

SP-05 OVERVIEW

Strategic Plan Overview

The Division of Housing offers a broad range of financial and technical assistance to improve and expand housing, increase affordable housing opportunities, and provide services to people without housing. The variety of federal and state programs it manages benefits persons with disabilities, low- and moderate-income residents, and homeless populations. The Division partners with local governments, homeless service providers, developers, and housing organizations throughout the state to improve housing conditions for low- to moderate-income Wisconsin residents. It distributes over \$45 million annually.

It is the Division of Housing's mission to assist Wisconsin governments, businesses, and non-profit agencies to build and sustain quality communities and create economic opportunities by facilitating locally driven solutions to develop and improve community infrastructure, address affordable housing and homeless needs, and foster economic growth and job creation and retention.

The Division of Housing has identified five high priority needs for the State of Wisconsin:

- Affordable Housing: fund the construction and rehabilitation of affordable housing, and provide rental and down payment assistance to lower income households.
- Homelessness: provide funding for emergency shelter, street outreach, prevention, and rapid re-housing.
- Special Needs Assistance: assist persons experiencing homelessness, special needs populations, and persons with HIV/AIDS.
- Community Development: address community development needs such as the need for public facilities and planning grants.
- Economic Development: address economic development needs through economic development loans and job training.

The Division of Housing has identified 12 goals for the State of Wisconsin:

- Rehabilitate Owner Occupied Housing
- Rehabilitate Rental Housing
- Build New Rental Housing
- Provide Down Payment Assistance for Homebuyers
- Provide Tenant-Based Rental Assistance for Homeless or Special Needs Populations
- Provide Assistance to Those Experiencing Homelessness or at Risk of Homelessness
- Assist Communities with Public Facilities Projects
- Create and Retain Jobs through Economic Development Assistance and Job Training
- Increase Housing Options for Persons Living with HIV/AIDS
- Increase Access to Benefits for those Living with Mental Health Issues
- Assist Communities with Local Planning
- Special Projects

SP-10 GEOGRAPHIC PRIORITIES – 91.315(A)(1)

General Allocation Priorities

CDBG: The Division of Housing does not typically award CDBG funds in entitlement communities that receive CDBG funds from HUD directly. CDBG Non-Housing programs typically receive applications from units of local government (UGLGs) across Wisconsin. Applications are reviewed and funded with those projects that will have a positive impact on low- and moderate-income persons receiving priority. The CDBG Housing program distributes funds to seven housing regions, and then the regional administrator of each housing region distributes dollars around the region.

HOME: The Division of Housing does not award HOME funds in participating jurisdictions or consortia that receive HOME funds directly from HUD. Rental Housing Development, Homebuyer and Rehabilitation, and Tenant Based Rental Assistance funds are awarded in the rest of the state (not in participating jurisdictions or consortia) on a competitive basis.

ESG: In Wisconsin, the Division of Housing, and the cities of Madison, Milwaukee, and Racine receive ESG funds directly from HUD. DOH ESG funds are awarded on a formula basis to regional entities throughout the state using indicators of poverty and homelessness.

HOPWA: The Division of Housing ensures, currently through its contract with Aids Resource Center of Wisconsin (ARCW), full coverage in the 66 counties in DOH's HOPWA area.

SP-25 PRIORITY NEEDS – 91.315(A)(2)

Priority Needs

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Persons with Physical Disabilities
	Associated Goals	Rehabilitate Owner Occupied Housing Rehabilitate Rental Housing Build New Rental Housing Provide Down Payment Assistance to Homebuyers Provide Tenant-Based Rental Assistance Special Projects
	Description	The Division of Housing funds affordable housing programs through CDBG Housing and HOME funding. These programs fund the construction and rehabilitation of affordable housing, and provide rental and down payment assistance to lower income households.
	Basis for Relative Priority	Needs Assessment and Market Analysis data, public survey results, and public input have all revealed a persistent need for housing affordable to lower income households.
2	Priority Need Name	Homelessness
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse

		veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Associated Goals	Provide Tenant-Based Rental Assistance Provide Homeless Assistance Increase Access to Benefits Special Projects
	Description	The Division of Housing funds homeless assistance programs through its ESG program. This program provides funding for emergency shelter, street outreach, prevention, and rapid re-housing.
	Basis for Relative Priority	Data included in the Needs Assessment and Market analysis has shown that WI homelessness has increased over the past 5 years, revealing a need for investment in evidence based practices to best prevent and end homelessness.
3	Priority Need Name	Special Needs Assistance
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Associated Goals	Provide Tenant-Based Rental Assistance Increase Housing Options for Persons with HIV/AIDS Increase Access to Benefits Special Projects
	Description	The Division of Housing funds special needs programs through its ESG and HOPWA programs. ESG assists special needs populations who are experiencing homelessness, and HOPWA assists persons with HIV/AIDS.
	Basis for Relative	Data included in the Needs Assessment and Market analysis show a large population of elders, frail elders, persons with disabilities, persons with substance abuse disorders, and

	Priority	persons with HIV/AIDS. While not all persons with special needs need housing assistance, persons with special needs experience higher rates of housing problems.
4	Priority Need Name	Community Development
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Non-housing Community Development
	Associated Goals	Assist Communities with Public Facilities Projects Assist Communities with Local Planning Special Projects
	Description	The Division of Housing funds community development programs through its CDBG funding. These programs address community development needs such as the need for public facilities and planning grants.
	Basis for Relative Priority	Stakeholder and public survey feedback indicated a need for community development projects, especially in areas with aging public infrastructure.
5	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Non-housing Community Development
	Associated Goals	Create Jobs Through ED Assistance and Job Training Special Projects
	Description	The Division of Housing funds economic development programs through CDBG funding. CDBG programs address economic development needs through economic development loans and job training.
	Basis for Relative Priority	Data presented in the Market Analysis, and stakeholder and public input have revealed a need for investment in economic development and job training in communities across the state.

Table 44 – Priority Needs Summary

Narrative (Optional)

The State of Wisconsin encourages public and private action that will facilitate the inclusion of bicycle-oriented and pedestrian-oriented design in residential developments and mixed-use developments that include residential elements. The geographic scope of the Division of Housing planning authority is limited to CDBG non-entitlement areas and all CDBG planning grants are targeted to meet a CDBG National Objective in accordance with HUD program regulations. The review and approval of local units of government comprehensive plans are performed by the Division of Intergovernmental Relations.

SP-30 INFLUENCE OF MARKET CONDITIONS – 91.315(B)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The Division of Housing will use TBRA funds in markets where there are rental housing choices for lower income renters and persons experiencing homelessness, but where they are experiencing or would experience a housing cost burden and need temporary assistance with monthly payments.
TBRA for Non-Homeless Special Needs	The Division of Housing will use TBRA funds in markets where there are rental housing choices for lower income special needs renters and persons experiencing homelessness, but where they are experiencing or would experience a housing cost burden and need temporary assistance with monthly payments.
New Unit Production	New units of rental housing will be constructed in markets with a significant number of low income renter households and an insufficient stock of affordable housing units. New owner occupied units may be produced if there is a market and need for the units.
Rehabilitation	Rehabilitation will be used in markets where there are significant numbers of low income households requiring rental or owner occupied housing and an adequate stock of housing units which could be rehabilitated into decent, safe, and sanitary housing.
Acquisition, including preservation	The Division of Housing will provide acquisition funds to grantees when demand demographics show that the project will be financially feasible.

Table 45 – Influence of Market Conditions

SP-35 ANTICIPATED RESOURCES - 91.315(A)(4), 91.320(C)(1,2)

Introduction

The following table summarizes the anticipated resources, broken down by program type, allocated by the Division of Housing during the Consolidated Plan's planning period (FY 2015-2019).

Anticipated Resources

Program	Source of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total:	Expected Amount Available Reminder of ConPlan
					\$	\$
CDBG	public-federal	16,701,042	17,000,000	23,976,318	57,677,360	164,000,000
HOME	public-federal	7,600,133	1,000,000	5,000	8,605,133	34,600,000
ESG	public-federal	3,453,944	0	100,000	3,553,944	12,000,000
HOPWA	public-federal	468,812	0	0	468,812	1,800,000
CDBG-DR	public-federal	0	0	1,200,000	1,200,000	4,100,000

Table 46 - Anticipated Resources

*This amount reflects a \$7.6 Million reduction imposed by the Federal Department of Housing and Urban Development (HUD) due to a number of failed projects by the former Administration's Department of Commerce.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG Economic Development funding is often used as gap financing, allowing it to leverage other sources of funds at the local level. CDBG Public Facilities, Planning, and Public Facilities for Economic Development have a 50% match requirement. This requirement is often satisfied using funds from local government and other state or federal agencies.

HOME funding may also be used to leverage other funding. The 25% match requirement for the HOME programs is met through a combination of private financing, cash contributions, investments from state and local government sources, and donated land, materials, services, and labor. The Division of Housing administers the Housing Cost Reduction Program, which is used to fund affordable housing programs.

The 100% ESG match requirement is met through use of state homeless funds, federal and state programs, local government contributions, cash donations, and donated materials, services, and labor. State funds used to end homelessness include the Homeless Prevention Program, Transitional Housing Program, State Shelter Subsidy Grants, and Critical Assistance program.

HOPWA formula grants do not have matching requirements.

If appropriate, describe publically owned land or property located within the state that may be used to address the needs identified in the plan

Not Applicable.

Discussion

The Division of Housing will meet with the Wisconsin Housing and Economic Development Authority (WHEDA), the administrator of the Low Income Housing Tax Credits, to coordinate affordable housing resources. Members of WHEDA's staff provide advice to DOH's Rental Housing Development (RHD) program.

SP-40 INSTITUTIONAL DELIVERY STRUCTURE – 91.315(K)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

The Division of Housing develops housing policy and offers a broad range of program assistance and funds to address homelessness and support affordable housing, public infrastructure, and economic development opportunities. The Division partners with local governments and service providers, non-profit agencies, housing authorities, and developers. However, the Division is the sole lead agency responsible for the creation and implementation of this Consolidated Plan. The Division is comprised of the following three bureaus:

- The Bureau of Community Development is responsible for public infrastructure, blight elimination, and business development activities.
- The Bureau of Supportive Housing oversees homeless and special needs programs.
- The Bureau of Affordable Housing administers home purchase and rehabilitation, single family and multifamily development, and disaster recovery assistance.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Department of Administration, Division of Housing	Government agency	<ul style="list-style-type: none"> • Affordable housing—ownership • Affordable housing—rental • Public housing • Homelessness • Non-homeless special needs • Community development: public facilities • Community development: economic development • Planning 	State

Table 47 - Institutional Delivery Structure

Assess Strengths and Gaps in the Institutional Delivery System

The Division of Housing works directly with units of local government (UGLGs) and economic development agencies and organizations; and housing program staff work with community housing development organizations (CHDOs), nonprofit agencies, and tribal authorities. In addition, DOH encourages activities with private sector partners. The Division will continue to support and train local housing and homeless service sponsors, encourage local and regional consortia of housing and service providers, and work with intermediaries to provide technical assistance to grantee agencies.

The Division has developed a regional delivery system to distribute the portion of Wisconsin's Community Development Block Grant (CDBG) funds dedicated to housing. This network provides funds to "Small City" jurisdictions that do not receive direct CDBG funding from HUD ("the entitlement communities"). Through this network, many administrative duties are carried out by regional administrative agencies, thus allowing local agencies to focus on priority housing projects that meet local needs.

The Division of Housing works with an established network of CHDOs in the State of Wisconsin. It has previously certified 23 organizations as part of the institutional delivery structure for developing and operating affordable housing in Wisconsin. Annual recertification by DOH of all CHDO's maintains the quality and integrity of these organizations.

Recent changes to the HOME program rule have opened some gaps in CHDO institutional delivery structure. It is now much more difficult for CHDOs to enter into partnerships with private developers on LIHTC projects. These formerly strong partnerships were key for statewide affordable housing stakeholders in building additional multi-family units for a needy population.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	x	x	x
Legal Assistance	x	x	x
Mortgage Assistance	x		x
Rental Assistance	x	x	x
Utilities Assistance	x	x	x
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	x	x	
Supportive Services			
Alcohol & Drug Abuse	x	x	
Child Care	x		
Education	x		
Employment and Employment Training	x		
Healthcare	x		
HIV/AIDS	x	x	x
Life Skills	x	x	
Mental Health Counseling	x	x	
Transportation	x	x	
Other			
Other			

Table 48 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Services targeted to persons experiencing homelessness are delivered by homeless service agencies throughout the state. Many of these agencies participate in their respective Continuum of Care, which governs service provision and standards. The ESG program recently required certification by the area Continuum of Care in order to receive funding. Steps such as these are intended to encourage homeless service providers to participate in their Continuum of Care. This allows for a coordinated effort to prevent and end homelessness at the regional level.

In addition, the ESG program requires recipients to assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), mainstream services, and other federal, state, local, and private assistance available for such individuals.

DOH's HOPWA grant funds services and housing support for persons with HIV/AIDS in the 66 county HOPWA service areas. Other areas of Wisconsin are served by the Milwaukee and Minneapolis HOPWA allocations.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

A strength in the service delivery system is the State Interagency Council, which meets bi-monthly to discuss homelessness as it relates to multiple programs housed across state agencies. Another is the collaborative relationship between DOH and the four Continua of Care. The governance systems of the Continua of Care have continued to grow stronger, allowing them to address service gaps and reduce duplication of services.

A weakness in the institutional delivery structure is the difficulty in meeting the needs of those experiencing homelessness across the state. Rural communities often lack supportive services and permanent supportive housing, making it difficult to house chronically homeless individuals and households. Urban communities often have a greater diversity of service types than rural areas, but must turn households away due to the lack the funds available to serve all of those in need.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Division of Housing will continue to work with the Continua of Care and other stakeholders to address gaps in the institutional delivery structure. The continued implementation of coordinated assessment at the Continua of Care level will help those experiencing homelessness in accessing multiple parts of the institutional delivery structure. ESG grantees will continue to be required to work within their CoC and participate in coordinated assessment. Whenever possible, the Division of Housing will encourage or require emphasize evidence based practices in its programs in order to ensure that funds are spent efficiently.

SP-45 GOALS SUMMARY – 91.315(A)(4)

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitate Owner Occupied Housing	2015	2019	Affordable Housing	Affordable Housing	CDBG: \$54,656,533 HOME: \$7,580,432	Homeowner Housing Rehabilitated: 3352 Household Housing Unit
2	Rehabilitate Rental Housing	2015	2019	Affordable Housing	Affordable Housing	CDBG: \$137,731 HOME: \$6,448,949	Rental units rehabilitated: 127 Household Housing Unit
3	Build New Rental Housing	2015	2019	Affordable Housing	Affordable Housing	HOME: \$13,897,897	Rental units constructed: 257 Household Housing Unit
4	Provide Down Payment Assistance to Homebuyers	2015	2019	Affordable Housing	Affordable Housing	CDBG: \$550,925 HOME: \$10,510,773	Direct Financial Assistance to Homebuyers: 893 Households Assisted
5	Provide Tenant-Based Rental Assistance	2015	2019	Affordable Housing	Affordable Housing	HOME: \$5,363,904	Tenant-based rental assistance / Rapid Rehousing: 1667 Households Assisted
6	Provide Homeless Assistance	2015	2019	Homeless	Homelessness	ESG: \$15,000,000	Tenant-based rental assistance / Rapid Rehousing: 30000 Households Assisted Homeless Person Overnight Shelter: 40000 Persons Assisted Homelessness Prevention: 40000 Persons Assisted Other: 15000 Other
7	Assist Communities with Public Facilities Projects	2015	2019	Non-Housing Community Development	Community Development	CDBG: \$38,020,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 114060 Persons Assisted
8	Create Jobs Through ED Assistance and Job Training	2015	2019	Non-Housing Community Development	Economic Development	CDBG: \$99,340,000	Jobs created/retained: 2838 Jobs
9	Increase	2015	2019	Non-	Special Needs	HOPWA:	Tenant-based rental

	Housing Options for Persons with HIV/AIDS			Homeless Special Needs	Assistance	\$2,250,000	assistance / Rapid Rehousing: 725 Households Assisted
10	Increase Access to Benefits	2015	2019	Homeless Non-Homeless Special Needs	Special Needs Assistance	CDBG: \$1,124,000	Public service activities other than Low/Moderate Income Housing Benefit: 1124 Persons Assisted
11	Assist Communities with Local Planning	2015	2019	Non-Housing Community Development	Community Development	CDBG: \$5,620,000	Other: 225 Other
12	Special Projects	2015	2019	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Affordable Housing Homelessness Special Needs Assistance Community Development Economic Development	CDBG: \$2,248,000 HOME: \$448,046	Other: 5 Other

Table 49 – Goals Summary

Goal Descriptions

1	Goal Name	Rehabilitate Owner Occupied Housing
	Goal Description	The Division of Housing will provide funds to rehabilitate owner occupied housing through its HOME and CDBG programs.
2	Goal Name	Rehabilitate Rental Housing
	Goal Description	The Division of Housing will provide funds to rehabilitate rental housing through its HOME and CDBG programs.
3	Goal Name	Build New Rental Housing
	Goal Description	The Division of Housing will provide funds to build new rental housing through its HOME program.
4	Goal Name	Provide Down Payment Assistance to Homebuyers
	Goal Description	The Division of Housing will provide down payment assistance to homebuyers through its CDBG and HOME programs.
5	Goal Name	Provide Tenant-Based Rental Assistance
	Goal Description	The Division of Housing will provide tenant-based rental assistance to homeless and special needs populations through its HOME TBRA program.

6	Goal Name	Provide Homeless Assistance
	Goal Description	The Division of Housing will provide assistance to those experiencing homelessness or at risk of homelessness through its ESG program. The "other" goal outcome indicator refers to the number of persons assisted with street outreach.
7	Goal Name	Assist Communities with Public Facilities Projects
	Goal Description	The Division of Housing will assist communities with public facilities projects using CDBG funding.
8	Goal Name	Create Jobs Through ED Assistance and Job Training
	Goal Description	The Division of Housing will create jobs through economic development assistance and job training using CDBG funding.
9	Goal Name	Increase Housing Options for Persons with HIV/AIDS
	Goal Description	The Division of Housing will increase housing options for persons living with HIV/AIDS through its HOPWA program.
10	Goal Name	Increase Access to Benefits
	Goal Description	The Division of Housing will increase access to benefits for those living with mental health issues using CDBG funding.
11	Goal Name	Assist Communities with Local Planning
	Goal Description	The Division of Housing will assist communities with local planning using CDBG funds. The "other" goal outcome indicator refers to the number of communities assisted.
12	Goal Name	Special Projects
	Goal Description	The Division of Housing will fund special projects as needs arise throughout the state. These projects may be pilot-type projects or may be new activities that the state has not funded in the past. The "other" goal outcome indicator refers to the number of special projects undertaken.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

It is difficult to determine the number of extremely low-income and moderate-income families who will be served with HOME funds, however, based on the goals listed above there will be 239 households assisted with new housing opportunities, 3,479 households assisted with rehabilitation, 893 households provided with down payment assistance and 1,667 households assisted with tenant based rental assistance.

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not Applicable.

Activities to Increase Resident Involvements

Not Applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

The Division of Housing has no administrative authority over Public Housing Authorities. There is one Public Housing Authority in Wisconsin designated as “troubled” under the Section 8 Management Assessment Program (SEMAP).

Plan to remove the ‘troubled’ designation

Although the Division does not have any specific responsibility related to addressing SEMAP issues, DOH staff will continue to serve as resource advisors to the Wisconsin Association of Housing Authority board of directors and be available to provide assistance to “troubled” PHAs where feasible. DOH staff regularly attend WI Association of Housing Authority meetings and conferences to announce funding opportunities and provide information applicable to public and assisted housing.

Through its HCRI/HOME homebuyer program, the Division of Housing will continue to offer funds which can be used by grantees to provide down payment and closing cost assistance to public housing or other assisted housing residents seeking to become homeowners provided that they meet the income qualifications. Through the HOME TBRA and Homeless Prevention programs, funds will continue to provide short to medium term rental assistance as well as security deposits and first/last month rent to support individuals and families that may soon be housing authority tenants or housing choice voucher participants.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The State of Wisconsin's "home rule" provisions mean that zoning ordinances are left to the judgment of local governments. Sometimes local governments, in an attempt to cover the broad-based costs of public facilities improvements or to slow down a boom in new housing starts, will choose to impose impact fees, increasing lot sizes and setbacks, or establishing minimum square foot requirements for new residences. State statutes do allow local governments to waive impact fees for affordable housing developments, but it is not known how often these fees are actually waived. The net effect of these local actions may make housing more expensive than it would be without the new fees and regulations, which may represent a barrier to affordable housing for people in lower income brackets.

The Division of Housing respects this constitutional policy of local control, and therefore cannot directly intervene to remove barriers to affordable housing that results from a local ordinance's imposition of regulations or fees. The Division of Housing and other state agencies do work to ameliorate barriers to affordable housing in several ways, including:

- Support for the WIHousingSearch.org website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.
- The Division of Housing works to improve the stock of affordable housing in non-entitlement jurisdictions through its state- and federally-funded housing programs.
- The Wisconsin Housing and Economic Development Authority's (WHEDA) Low-Income Housing Tax Credit (LIHTC) program offers a reduction in tax liability to property owners and private investors to encourage the development of affordable rental housing.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Centralized or coordinated assessment has the potential to create more efficient homeless service systems by targeting resources toward those who need them most and helping clients move through the system faster. In Wisconsin, coordinated assessment is being implemented at the CoC level. The Division of Housing will continue to require participation in coordinated assessment for their CoC as a part of the ESG program. If the coordinated assessment system is still in the implementation phase, the recipient must participate in its implementation and eventually its use.

The Division of Housing recognizes that street outreach to those experiencing homelessness is necessary in order to engage them and work towards housing stability. The Division of Housing will encourage the use of best practices in street outreach which seek to meet basic needs and engage those experiencing homelessness in a respectful way.

Addressing the emergency and transitional housing needs of homeless persons

Emergency shelter is a critical part of the homeless service system. Shelters provide temporary refuge and often serve as the “front door” or first place of entry to those experiencing homelessness. As such, it is important that emergency shelters have the ability to connect those experiencing homelessness with the resources needed to exit homelessness using the lightest touch possible. Recently, the Division of Housing measured the performance of emergency shelters using a variety of metrics, including clients served, average length of stay, recidivism, and occupancy rate. The Division of Housing will continue its effort to measure performance and direct more funding towards best performing programs. New transitional housing projects are not funded by the ESG program, but DOH encourages the use of transitional housing in cases where it has been demonstrated to be efficient and effective.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The ESG program requires each local CoC to have a rapid-rehousing program and encourages local CoCs to spend more than the minimum requirement on rapid re-housing programs. Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing. This has the potential to decrease the length of time participants spend homeless, taking strain off of the shelter system. Case management and other voluntary services provided along with rental subsidy aim to stabilize families so that they can maintain rent payments after rental assistance ends.

Homeless prevention programs are also funded by both ESG and other state funds. These funds allow agencies to keep individuals and families from becoming homeless in the first place. This allows families to avoid potential trauma, upheaval, and an eviction on their record. In order to promote efficient use

of funds, the Division of Housing encourages targeting of prevention funds towards those with the greatest need.

The HOME TBRA program targets individuals or families who are homeless or at risk of homelessness and have at least one household member with a disability, with priority to those with mental health issues. This program provides up to 24 months of rental assistance, which can help families stabilize after an experience with housing instability or homelessness.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Through its involvement with the Interagency Council, the Division of Housing works with the four Wisconsin CoCs and other state agencies which house publically funded systems that may discharge persons into housing instability or homelessness. Collaboration allows DOH and these agencies to work towards discharge planning solutions. Recently, the Division of Housing collaborated with the Department of Children and Families to fund a program targeted at youth who have aged out of the foster care system and are experiencing homelessness or are at risk of homelessness.

SP-65 LEAD BASED PAINT HAZARDS – 91.315(I)

Actions to address LBP hazards and increase access to housing without LBP hazards

Several areas of the state have funds available to reduce lead-based paint hazard exposure in affordable housing. Owner-occupied housing units must be occupied by families at or below 80% of the county median income. Vacant units must be marketed to families. Children under age six living in the unit must have a blood test within six months prior to construction activities in order for the family to receive assistance. Priority will be given to households occupied by children that have high levels of lead in their blood. Hazard reduction activities will be determined by certified risk assessors, and certified contractors must perform the work. Units assisted must pass federal clearance levels at project completion.

Under state law, the Department of Health Services (DHS) implements a comprehensive statewide lead poisoning prevention program and all blood lead tests are reported to DHS. DHS then distributes these blood lead test results so that local health departments can provide follow up services to families of lead exposed children and work to prevent future exposures. DHS distributes state funding and provides guidance to local health departments to support this work. DHS matches data with Medicaid and helps assure that Medicaid children are tested as required. As resources permit, DHS provides data to encourage health care providers to test high risk children under their care. DHS provides data, editing and technical support for local agencies in their applications for HUD funding to address lead paint hazards. DHS has implemented grants from HUD to address lead paint hazards in housing and has partnered with DOH on the most recent HUD grant by providing technical assistance, e.g., oversight and review of the risk assessments conducted to evaluate lead hazards and to develop work plans appropriate to address the hazards.

How are the actions listed above integrated into housing policies and procedures?

All Division of Housing Programs: The Division of Housing programs document all chipping, peeling, flaking, and/or chalking paint in the housing quality standards inspection as a hazard. All rehabilitation conducted in pre-1978 homes use lead-safe work practices (unless the paint is inspected and tested negative). The contractor must be trained as a lead-safe renovator and provide a copy of their training certificate to the grant administrator. After work is finished, a lead clearance is conducted by a certified professional to ensure the property is safe.

CDBG Housing: The CDBG Housing program documents all chipping, peeling, flaking, chalking paint in the housing quality standards inspection as a hazard. All rehabilitation conducted in pre-1978 homes use lead-safe work practices (unless the paint is inspected and tested negative). The contractor must be trained as a lead-safe renovator and provide a copy of their training certificate to the grant administrator. After work is finished, a lead clearance is conducted by a certified professional to ensure the property is safe.

EAP: The Emergency Assistance Program (EAP) directs funds specifically to housing rehabilitation needs created by the disaster. The program does not inspect the entire residence, however should the “spot rehabilitation” activities involve lead remediation the contractor must be a lead-safe renovator.

HOME HHR: The HOME Homebuyer and Rehabilitation (HHR) program provides funds for homebuyer assistance and owner-occupied or rental rehabilitation. Under HOME HHR owner-occupied rehabilitation, funds are provided for making essential improvements to single-family homes serving as the principal residence of LMI owners. Lead-based paint hazard reduction is one of the eligible costs.

HOME TBRA: The HOME Tenant Based Rental Assistance (TBRA) program requires that a lead-based paint disclosure form is given to all TBRA clients and every unit is inspected for lead-based paint hazards before occupancy occurs. Both of these procedures are checked during monitoring visits of HOME TBRA-funded programs.

ESG: Any renovation carried out with Emergency Solutions Grant (ESG) assistance shall be sufficient to ensure that the building involved is lead-safe and sanitary. The requirements pertaining to rehabilitation differ according to level of federal support. ESG funds given to operate shelters requires that the facility must be free from lead-based paint contamination wherein clients may potentially stay for more than 100 days unless the facility is such that it is statutorily exempted. For homelessness prevention and rapid re-housing, every assisted unit must be free from lead-based paint contamination wherein that assistance lasts more than 100 days, or is for first month rent payment and/ or security deposit assistance, or where the residents select their own housing. When lead-based paint requirements do apply the requirements around notice of evaluation, presumption, hazard reduction activities and the provision of an information pamphlet apply.

HOPWA: While Housing Opportunities for Persons with AIDS (HOPWA) assists eligible persons in their existing housing, the program works with beneficiaries to identify housing options without lead-based paint and other hazards.

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Division of Housing remains firmly committed to growing Wisconsin's economy for the benefit of all of its citizens and sees the provision of affordable housing and community development as a critical component of that commitment. The overarching goal of this anti-poverty strategy is to reduce the number of families and individuals currently living in poverty.

Economic development and affordable housing play a crucial role in addressing issues of self-sufficiency. Applications for economic development grants are accepted continuously and through a regional funding model the Division of Housing works to ensure that the affordable housing programs' funds are equitably spread across the entire state.

The Division of Housing intends to maintain its commitment to fund local programs that have a record of acceptable performance and that integrate DOH affordable housing programs with local human development, social services and other affordable housing and antipoverty initiatives. It will continue to provide oversight of grantees to assure compliance with applicable regulations and contracts. Also, DOH will assess the effectiveness of local agencies in delivering housing assistance, reducing homelessness, and helping low-income families and individuals attain self-sufficiency.

The Division of Housing also seeks to develop or strengthen collaboration with other housing-related funders as well as with other state agencies, task forces and the private sector to maximize effectiveness in addressing housing problems of low income households.

The Division of Housing intends to expand and preserve affordable housing options for low income persons, particularly for vulnerable households with severe cost burdens and those earning below 50% of county median income with particular consideration for challenged households earning below 30% county median income.

It strives to eliminate lead-based paint and other health and safety hazards and support rehabilitation, accessibility and lead safe maintenance and energy improvements in Wisconsin's housing stock.

It supports initiatives to prevent homelessness and other efforts to provide a full spectrum of local homeless continuum of care activities and strategies which are effective in stabilizing housing situations and providing skills development to allow these individuals to eventually obtain better jobs and become more self-sufficient.

A future area of concern for DOH is how housing needs will change as Wisconsin's population ages. Particularly for low-income persons, the changes that come with age such as decreasing mobility, health status, and/or ability to care for oneself reduces the aging population's ability to keep their homes and successfully age in place. DOH will continue to fund housing rehabilitation activities that allow low-income persons to age in place through accessibility improvements.

The Division of Housing's community development programs are another key way that the Division addresses issues of economic self-sufficiency and combating poverty. Economic Development grant funds are awarded to local governments to assist businesses in creating or retaining jobs for individuals with low and moderate incomes. Examples of Economic Development projects include: business loans to expand facilities or purchase equipment, specialized employee training, or business infrastructure projects. Public Facility Economic Development grants are awarded to local governments for public

infrastructure projects that support business expansion or retention of job opportunities for low- and moderate-income individuals. These investments in local communities help to both strengthen economic sustainability and reduce poverty.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

As part of the response to the issues identified in the previous section, the Division of Housing remains committed to providing flexibility when possible to local programs in their efforts to address community needs. The Division of Housing recognizes that local and regional anti-poverty agencies are well-situated to understand and respond to the specific local needs of their individual communities. Therefore, the Division of Housing will seek to provide funding to help these agencies support housing initiatives as a critical component of their unique mix of programs operating to advance economic self-sufficiency.

To maximize effectiveness and minimize redundancy, the Division of Housing will also seek to develop or strengthen collaboration with other housing-related funders in Wisconsin, such as the Wisconsin Housing and Economic Development Authority (WHEDA) and the United States Department of Agriculture-Rural Development (USDA-RD). DOH is committed to collaboration by continued relationships with the Wisconsin Division of Energy Services' weatherization assistance program for low-income households. In addition, the Division of Housing will coordinate with the Department of Workforce Development to connect educational and job training programs for low-income and homeless residents. By collaborating with these groups, the Division of Housing maximizes the impact of its dollars and the quality of its program outcomes.

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

In general, it is the Division of Housing's policy to monitor each grant at least once during the contract performance period by either an on-site or a desk monitoring. The grantee is monitored for program compliance with all contract requirements and program regulations by reviewing administrative, financial, and project files. Typically the grantee is also required to submit ongoing reports to ensure they are on target for meeting contract requirements. Monitoring is guided by use of an established monitoring checklist which is readily available to all grantees in the program implementation handbook. Also included in the monitoring is ensuring adherence to minority business outreach. Division of Housing programs utilize a risk matrix to determine which type of monitoring will occur for each grant.

YEAR ONE ACTION PLAN

AP-15 EXPECTED RESOURCES – 91.320(C)(1,2)

Introduction

The following table summarizes the anticipated resources, broken down by program type, allocated by the Division of Housing during the Annual Action Plan's planning period (FY 2015).

NOTE: The following sections in the Annual Action Plan will be finalized once the Division of Housing receives final allocation information. Estimates of funding to goals will be adjusted proportionately at that time.

Anticipated Resources

Program	Source of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total:	Expected Amount Available Reminder of ConPlan
					\$	\$
CDBG	public-federal	16,701,042*	17,000,000	23,976,318	57,677,360	164,000,000
HOME	public-federal	7,600,133	1,000,000	5,000	8,605,133	34,600,000
ESG	public-federal	3,453,944	0	100,000	3,553,944	12,000,000
HOPWA	public-federal	468,812	0	0	468,812	1,800,000
CDBG-DR	public-federal	0	0	1,200,000	1,200,000	4,100,000

Table 50 - Expected Resources – Priority Table

*This amount reflects a \$7.6 Million reduction imposed by the Federal Department of Housing and Urban Development (HUD) due to a number of failed projects by the former Administration's Department of Commerce.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG Economic Development funding is often used as gap financing, allowing it to leverage other sources of funds at the local level. CDBG Public Facilities, Planning, and Public Facilities for Economic Development have a 50% match requirement. This requirement is often satisfied using funds from local government and other state or federal agencies.

HOME funding may also be used to leverage other funding. The 25% match requirement for the HOME programs is met through a combination of private financing, cash contributions, investments from state and local government sources, and donated land, materials, services, and labor. The Division of Housing administers the Housing Cost Reduction Program, which is used to fund affordable housing programs.

The 100% ESG match requirement is met through use of state homeless funds, federal and state programs, local government contributions, cash donations, and donated materials, services, and labor. State funds used to end homelessness include the Homeless Prevention Program, Transitional Housing Program, State Shelter Subsidy Grants, and Critical Assistance program.

HOPWA formula grants do not have matching requirements.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not Applicable.

Discussion

The Division of Housing will meet with the Wisconsin Housing and Economic Development Authority (WHEDA), the administrator of the Low Income Housing Tax Credits, to coordinate affordable housing resources. Members of WHEDA's staff provide advice to DOH's Rental Housing Development (RHD) program.

AP-20 ANNUAL GOALS AND OBJECTIVES – 91.320(C)(3)&(E)

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitate Owner Occupied Housing	2015	2019	Affordable Housing	Affordable Housing	CDBG: \$16,881,228 HOME: \$1,502,366	Homeowner Housing Rehabilitated: 935 Household Housing Unit
2	Rehabilitate Rental Housing	2015	2019	Affordable Housing	Affordable Housing	CDBG: \$56,841 HOME: \$1,296,017	Rental units rehabilitated: 26 Household Housing Unit
3	Build New Rental Housing	2015	2019	Affordable Housing	Affordable Housing	HOME: \$2,592,034	Rental units constructed: 47 Household Housing Unit
4	Provide Down Payment Assistance to Homebuyers	2015	2019	Affordable Housing	Affordable Housing	CDBG: \$227,363 HOME: \$2,074,696	Direct Financial Assistance to Homebuyers: 187 Households Assisted
5	Provide Tenant-Based Rental Assistance	2015	2019	Affordable Housing	Affordable Housing	HOME: \$1,064,019	Tenant-based rental assistance / Rapid Rehousing: 330 Households Assisted
6	Provide Homeless Assistance	2015	2019	Homeless	Homelessness	ESG: \$3,553,944	Tenant-based rental assistance / Rapid Rehousing: 6,000 Households Assisted Homeless Person Overnight Shelter: 8,000 Persons Assisted Homelessness Prevention: 8,000 Persons Assisted Other: 3,000 Other
7	Assist Communities with Public Facilities Projects	2015	2019	Non-Housing Community Development	Community Development	CDBG: \$13,403,208	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 40,210 Persons Assisted
8	Create Jobs Through ED Assistance and Job Training	2015	2019	Non-Housing Community Development	Economic Development	CDBG: \$25,024,531	Jobs created/retained: 716 Jobs
9	Increase Housing Options for Persons with HIV/AIDS	2015	2019	Non-Homeless Special Needs	Special Needs Assistance	HOPWA: \$468,812	Tenant-based rental assistance / Rapid Rehousing: 151 Households Assisted

10	Increase Access to Benefits	2015	2019	Homeless Non-Homeless Special Needs	Special Needs Assistance	CDBG: \$406,774	Public service activities other than Low/Moderate Income Housing Benefit: 407 Persons Assisted
11	Assist Communities with Local Planning	2015	2019	Non-Housing Community Development	Community Development	CDBG: \$835,052	Other: 33 Other
12	Special Projects	2015	2019	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Affordable Housing Homelessness Special Needs Assistance Community Development Economic Development	CDBG: \$2,012,363 HOME: \$76,001	Other: 3 Other

Table 51 – Goals Summary

Goal Descriptions

1	Goal Name	Rehabilitate Owner Occupied Housing
	Goal Description	The Division of Housing will provide funds to rehabilitate owner occupied housing through its HOME and CDBG programs.
2	Goal Name	Rehabilitate Rental Housing
	Goal Description	The Division of Housing will provide funds to rehabilitate rental housing through its HOME and CDBG programs.
3	Goal Name	Build New Rental Housing
	Goal Description	The Division of Housing will provide funds to build new rental housing through its HOME program.
4	Goal Name	Provide Down Payment Assistance to Homebuyers
	Goal Description	The Division of Housing will provide down payment assistance to homebuyers through its CDBG and HOME programs.
5	Goal Name	Provide Tenant-Based Rental Assistance
	Goal Description	The Division of Housing will provide tenant-based rental assistance to homeless and special needs populations through its HOME TBRA program.

6	Goal Name	Provide Homeless Assistance
	Goal Description	The Division of Housing will provide assistance to those experiencing homelessness or at risk of homelessness through its ESG program. The "other" goal outcome indicator refers to the number of persons assisted with street outreach.
7	Goal Name	Assist Communities with Public Facilities Projects
	Goal Description	The Division of Housing will assist communities with public facilities projects using CDBG funding.
8	Goal Name	Create Jobs Through ED Assistance and Job Training
	Goal Description	The Division of Housing will create jobs through economic development assistance and job training using CDBG funding.
9	Goal Name	Increase Housing Options for Persons with HIV/AIDS
	Goal Description	The Division of Housing will increase housing options for persons living with HIV/AIDS through its HOPWA program.
10	Goal Name	Increase Access to Benefits
	Goal Description	The Division of Housing will increase access to benefits for those living with mental health issues using CDBG funding.
11	Goal Name	Assist Communities with Local Planning
	Goal Description	The Division of Housing will assist communities with local planning using CDBG funds. The "other" goal outcome indicator refers to the number of communities assisted.
12	Goal Name	Special Projects
	Goal Description	The Division of Housing will fund special projects as needs arise throughout the state. These projects may be pilot-type projects or may be new activities that the state has not funded in the past. The "other" goal outcome indicator refers to the number of special projects undertaken.

AP-25 ALLOCATION PRIORITIES – 91.320(D)

Introduction:

The Division of Housing's funding allocation priorities for the federal formula grant programs of CDBG, HOME, HOPWA and ESG are outlined in the table below. The percentage of funds allocated is shown by program type and the associated goal (see previous discussion of goals in SP-45 and AP-20). Because only whole numbers are allowed, there is a small amount of rounding error in the estimates.

Funding Allocation Priorities

	CDBG	HOME	HOPWA	ESG
Rehabilitate Owner Occupied Housing (%)	29	18	0	0
Rehabilitate Rental Housing (%)	0	15	0	0
Build New Rental Housing (%)	0	30	0	0
Provide Down Payment Assistance to Homebuyers (%)	0	24	0	0
Provide Tenant-Based Rental Assistance (%)	0	12	0	0
Provide Homeless Assistance (%)	0	0	0	100
Assist Communities with Public Facilities Projects (%)	23	0	0	0
Create Jobs Through ED Assistance and Job Training (%)	43	0	0	0
Increase Housing Options for Persons with HIV/AIDS (%)	0	0	100	0
Increase Access to Benefits (%)	1	0	0	0
Assist Communities with Local Planning (%)	1	0	0	0
Special Projects (%)	3	1	0	0
Total (%)	100	100	100	100

Table 52 – Funding Allocation Priorities

Reason for Allocation Priorities

The allocation priorities shown above are a reflection of the needs of the state and the restrictions of the programs. The Needs Assessment and Market Analysis showed a statewide need for affordable housing, homeless and special needs assistance, and community and economic development. Each of these priorities is addressed by the allocation, and is addressed by the program and funding type best suited to respond to the needs of the state. Funds contained in housing revolving loan funds may be used for owner occupied rehabilitation, rental rehabilitation, security deposits for those at risk of homelessness or experiencing homelessness, or down payment assistance. Funds contained in economic development revolving loan funds can be used to create jobs, retain jobs, or for microbusiness loans. Therefore, an estimated \$5,000,000 of CDBG funding used to further housing related goals will be collected by local housing revolving loan funds. In addition, an estimated \$12,000,000 of CDBG funding

used to further the "Create Jobs Through Economic Development Assistance and Job Training" goal will be collected by local economic development revolving loan funds. The "Special Projects" category contains funding that will be used toward pilot projects and projects not typically funded by the Division in order to best respond to the evolving needs of the state.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

The funding is distributed between goals in a way that meets the needs of the state, given the needs of the state and the capacity of current state programs. As described above, the priority needs and specific objectives are addressed by the distribution of funding amongst the goals.

AP-30 METHODS OF DISTRIBUTION – 91.320(D)&(K)

Introduction

The Division of Housing will use the following distribution methods for awarding program funds in CDBG, HOME, HOPWA and ESG. Key elements of the method of distribution include the criteria used to select and rank applications, availability of application manuals, applicable threshold factors and grant size limits. Additional information about each program can be found on the State of Wisconsin DOA-DOH website.

Distribution Methods

State Program Name
CDBG Housing
Describe the state program addressed by the Method of Distribution.
The Wisconsin Community Development Block Grant (CDBG) housing program provides grants to general purpose units of local government for housing programs which principally benefit low and moderate income (LMI) households. These funds are primarily used for rehabilitation of housing units (owner occupied and rental) and homebuyer assistance. CDBG dollars are flexible and responsive to local needs.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>The state is divided into several housing regions to administer the CDBG housing program. The regions receive fair share funds. These shares include base funding for each region. In addition to the base funding the remainder of the funds are divided using 4 factors: 1) Households below 80% of County Median Income and pay more than 30% of income on housing, 2) Average unemployment rate, 3) Percentage of LMI Households compared to the total statewide, 4) Percentage of structures built before 1950 compared to the total statewide.</p> <p>In addition to the regions, DOH offers municipalities the opportunity to withdraw from a region and apply separately for set-aside funds. These funds are determined using the same four-factor formula as the CDBG housing regions. DOH makes these funds available for local municipalities to apply separately. The award amount for a municipality may be reduced if applications are received with totals exceeding the total set-aside amount available.</p>
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)
The non- regional application is available on the Division's website when it is open. In addition, the application is emailed to every municipality in the state outside of Dane, Waukesha and Milwaukee Counties which receive funds directly from HUD. The regional applications are targeted to each region.
Describe how resources will be allocated among funding categories.
Explained above.
Describe threshold factors and grant size limits.
The fair share is determined based on funds available for CDBG Housing. The allocation for CDBG housing is entered into the formula and determined using the factors above.
What are the outcome measures expected as a result of the method of distribution?

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State Program Name
CDBG Emergency Assistance Program
Describe the state program addressed by the Method of Distribution.
The Emergency Assistance Program (EAP) utilizes CDBG housing and business assistance funds for communities that have sustained damages to LMI housing as a result of natural or manmade disasters (flooding, tornados, wind storms etc.). EAP funds are available on an on-going basis.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
Emergency Assistance Program (EAP) applications are evaluated for 1) the severity of impact from the disaster, 2) the LMI benefit and, 3) the financial need of the applicant.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)
The EAP program description and application materials are available on the Division's website. Funds are directed specifically to non-entitlement communities. EAP is in a unique position to address emergency (natural or manmade disasters) housing rehabilitation and business assistance needs in a coordinated and timely response. The Division is exploring options to get needed resources to the affected households more quickly. The seven CDBG housing regions could play a critical role in expediting this process.
Describe how resources will be allocated among funding categories.
Explained above.
Describe threshold factors and grant size limits.
EAP funds are available statewide and, depending on the nature and frequency of natural disasters, vary in their award amounts.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
CDBG Public Facilities
Describe the state program addressed by the Method of Distribution.
CDBG Public Facilities program addresses infrastructure issues in communities such as water, sanitary sewer, storm sewer, utilities, streets, waste water treatment, community centers and libraries.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>The primary criteria used to select applications for funding are:</p> <ul style="list-style-type: none"> • The three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • Activities listed must be eligible activities • Need for the funding
If only summary criteria were described, how can potential applicants access application manuals or other

state publications describing the application criteria? (CDBG only)
Applications and handbooks are available on the DOH website.
Describe how resources will be allocated among funding categories.
Resource allocation to CDBG Public Facilities will be based upon several factors, including: the number of applications received, historical funding amounts, State of Wisconsin needs and DOH priorities.
Describe threshold factors and grant size limits.
The grant size limit for Public Facilities is \$500,000, unless it is for urgent local need in which case the grant size limit is \$750,000.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
CDBG Planning
Describe the state program addressed by the Method of Distribution.
The CDBG Planning program allows communities to create plans to address issues of LMI and slum and blight. The plans can be comprehensive plans, economic development plans, and downtown redevelopment plan. Each plan must have an outcome that meets a national objective.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>The primary criteria used to select applications for funding are:</p> <ul style="list-style-type: none"> • The three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • Activities listed must be eligible activities • Need for the funding
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)
Applications and handbooks are available on the DOH website.
Describe how resources will be allocated among funding categories.
Resource allocation to CDBG Planning will be based upon several factors, including: the number of applications received, historical funding amounts, State of Wisconsin needs and DOH priorities.
Describe threshold factors and grant size limits.
The grant size limit for Planning Grant is \$25,000.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
CDBG Public Facilities Economic Development
Describe the state program addressed by the Method of Distribution.

The CDBG Public Facilities Economic Development program provides funds to communities to address infrastructure needs that support business expansion or retention. Examples of eligible activities include running new or improved water and sewer service or an expanded street. The activity must result in job opportunities for low to moderate income individuals.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>The primary criteria used to select applications for funding are:</p> <ul style="list-style-type: none"> • The three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • Activities listed must be eligible activities • Need for the funding
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)
Applications and handbooks are available on the DOH website.
Describe how resources will be allocated among funding categories.
Resource allocation to CDBG Public Facilities Economic Development will be based upon several factors, including: the number of applications received, historical funding amounts, State of Wisconsin needs and DOH priorities.
Describe threshold factors and grant size limits.
The grant size limit for Public Facility Economic Development is \$500,000.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
CDBG Economic Development
Describe the state program addressed by the Method of Distribution.
The CDBG Economic Development program provides funds to local government to assist with business expansion and retention. Examples of eligible activities include business loans to expand facilities, purchase equipment, employee training. The activity must result in job opportunities for low to moderate income individuals.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>The primary criteria used to select applications for funding are:</p> <ul style="list-style-type: none"> • The three National Objectives (benefit to LMI individuals, slum and blight, urgent local need) • Activities listed must be eligible activities • Need for the funding
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)
Applications and handbooks are available on the DOH website.
Describe how resources will be allocated among funding categories.
Resource allocation to CDBG Economic Development will be based upon several factors, including: the number of applications received, historical funding amounts, State of Wisconsin needs and DOH priorities.
Describe threshold factors and grant size limits.

The grant size limit for Economic Development is \$1,000,000.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
CDBG SOAR
Describe the state program addressed by the Method of Distribution.
<p>The SSI/SSDI Outreach, Access and Recovery (SOAR) program serves people who are homeless or at risk of becoming homeless and have a mental illness or a co-occurring substance use disorder. SOAR clients may include people who are homeless or who are returning to the community from institutions (e.g. jails, prisons or hospitals). The SOAR program helps increase access to mainstream government benefits, by expediting the entire SSI/SSDI application process. Securing SSI/SSDI benefits for Wisconsin's people who are homeless, or at risk of homelessness and have a mental illness or a co-occurring substance use disorder, not only confers an added quality of life for the client, but reduces the overall program cost associated with serving this population (e.g., shelter stays, incarceration, emergency department visits, and hospitalizations).</p>
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>Funds are awarded through a multi-year grant application process open to any eligible UGLGs (Units of General Local Government). Awarded grants can potentially be renewed in subsequent years, but the submission of a grant application is still required. Grant application will be evaluated based on the factors described below. Some criterion may be added based on the overall performance or issues that arose in the previous contract period.</p> <ul style="list-style-type: none"> • The extent to which the application demonstrates a need for SOAR services in the proposed service area including the presence of the target population (people who are homeless or at risk of becoming homeless and have a mental illness or a co-occurring substance abuse disorder). • Experience of UGLG and not-for profit (sub-recipient). Including performance and progress regarding all DOH-funded programs • The extent of the agency's successful experience with providing SOAR-related services to people who are homeless or at risk of becoming homeless and have a mental illness or a co-occurring substance abuse disorder. • The extent to which people who are homeless or at risk of becoming homeless and have a mental illness or a co-occurring substance abuse disorder or their family members are involved in the planning, implementation and evaluation of services offered by the applicant. • The extent to which the applicant has planned and describes the collaborative approach that must take place in providing SOAR Services • The extent to which the applicant will have necessary staff time dedicated to the provision of SOAR services. How will SOAR be prioritized? • The extent to which the applicant has a plan in place to meet the most important needs of their SOAR clients. (i.e. immediate housing, mental health services, addiction services, etc.) • The extent to which the applicant will be able to address the "critical component" to a successful SOAR program • The extent to which there are clearly defined SOAR goals and action steps and a time-line that is achievable. • The reasonableness of the budget and administrative costs and the ability to meet the match requirement • Overall contents, formatting and general comprehensiveness of the application. • The extent to which the applicant has a solid implementation plan for providing payee services to SOAR

clients that are approved for benefits.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)
All application manuals and other publications describing the application criteria will be made available on the Division of Housing website.
Describe how resources will be allocated among funding categories.
Described above.
Describe threshold factors and grant size limits.
Grant allocations are partially based on the number of applications that an applicant proposes to complete in the contract period and partially based on criterion listed above and available funding amounts. Also applicants must have staff members that are trained in the Stepping Stones to Recovery (SOAR) course, which is available in person and on-line.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
HOME Homebuyer and Rehabilitation (HHR)
Describe the state program addressed by the Method of Distribution.
<p>The program is designed to provide funding for three HOME-eligible activities:</p> <ul style="list-style-type: none"> • Homebuyer assistance: Direct assistance may be provided to eligible homebuyers for acquisition (down payment and closing costs), acquisition and rehabilitation, or new construction. Grantees may utilize the funds to construct housing for sale to low- and moderate-income (LMI) homebuyers (household income at or below 80% County Median Income). • Owner-occupied rehabilitation: Funds are provided for making essential improvements to single-family homes serving as the principal residence of LMI owners. In addition, Eligible costs include energy-related improvements, accessibility improvements, lead-based paint hazard reduction, and repair of code violations. • Rental rehabilitation: Funds are provided to landlords (up to four units) for making essential repairs to units rented to tenants at or below 60% of the county median income. While rental rehabilitation is a HOME-eligible activity under HHR, this type of activity is more frequently handled by the RHD program.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>Funding is allocated based on need to service households below 80% of County Median Income. Specific items requested in the application include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Amount of funds requested by each applicant and by activity • Housing need description • Marketing plan • Waiting lists • Outreach process • Implementation schedule
Describe how resources will be allocated among funding categories.

Explained above.
Describe threshold factors and grant size limits.
Explained above.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
HOME Rental Housing Development program (RHD)
Describe the state program addressed by the Method of Distribution.
<p>The priorities of the HOME RHD program are:</p> <ul style="list-style-type: none"> • To provide leverage of private financing for affordable rental housing; • To provide persons at or below 30% of County Median Income (CMI) additional affordable housing units; • To provide gap financing for affordable rental housing; • To construct buildings that provide accessibility features following Universal Design and follow visitability principles; • To develop projects that emphasize high energy efficiency and sustainability; • To promote supportive housing projects for populations with special needs; • To facilitate affordable rental projects that are “shovel-ready” and will start construction within 12 months of contract execution.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
<p>The application rounds are a competitive process including both threshold criteria as well as scoring categories. These requirements were implemented to both meet and exceed those outlined in the 2013 HOME Final Rule. Chief among these new requirements are the financial feasibility standards requiring that a subsidy layering review be completed for all projects to determine the staffing and financial capacity of the developing entity as well as the long-term feasibility of the proposed rental project. Specific criteria include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Percentage of units at or below 30% CMI/homeless/Section 811 • Preservation of any subsidized property (excluding Public Housing) • Percentage of visitable HOME units • Energy efficiency and sustainability • HOME cost per unit
Describe how resources will be allocated among funding categories.
If projects pass threshold then they will be scored and ranked. Projects will be funded as funds permit and until funding is exhausted.
Describe threshold factors and grant size limits.
<p>Threshold factors for applications:</p> <ul style="list-style-type: none"> • Long term viability • Demonstrated experience • Audited financials • CHDO certification • Debarment certification for entities receiving federal funds • Market demand documentation

- DFI documentation
- Readiness to proceed
- Percentage of CMI units

HOME RHD sets a maximum of \$500,000 per award, and no more than 2 awards per developer per year.

What are the outcome measures expected as a result of the method of distribution?

State Program Name

HOME Tenant Based Rental Assistance (TBRA)

Describe the state program addressed by the Method of Distribution.

Tenant Based Rental Assistance (TBRA) is a rental subsidy that sub-grantees can use to help individual households with incomes at or below 60% of the county median income (CMI) afford housing costs such as rent and security deposits. Sub-grantees may also assist tenants with utility deposits when HOME is used for rental assistance or security deposits. Households targeted for the HOME TBRA funds include homeless individuals with a disability, especially those with a mental illness, and households at risk of homelessness. The Division of Housing (DOH) encourages using a "Housing First" model of housing and support services.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Funds are awarded through a multi-year grant application process open to any UGLG (Units of General Local Government) or private nonprofit agency in Wisconsin that meets the application eligibility criteria. Awarded grants can potentially be renewed in subsequent years, but the submission of a grant application is still required. Submitted grant applications are reviewed and scored. Grant application will be evaluated based on the factors described below. Some criterion may be added based on the overall performance or issues that arose in the previous contract period.

- Completeness of application and attachments
- Agency staff, background and experience working with the described target population/TBRA program
- Agency budget and ability to provide support staff and resources to support TBRA
- Targeted population and strength of justification in choosing target population
- Program design and administration
- Outreach and inclusion of beneficiaries
- Explanation for how the match requirement will be met
- Availability of support services
- Long-term impact
- Coordination with local Continuum of Care
- WISP Participation and accuracy of report included in application
- Goal setting and implementation schedule
- Organization's track record, including the sub-grantee's past performance and progress regarding all of their DOH-funded grant programs

Describe how resources will be allocated among funding categories.

HOME TBRA funds can be used only for program services which include rental assistance payments and related security deposits and utility costs and for administration (limited to ten percent). Please note that the new HOME final rule of 2013 now allows HQS inspection costs, including travel and income determination cost also including travel to be charged to the program services allocation.

Describe threshold factors and grant size limits.
Grant award amounts are based on number of applications received, amount of available funding, applicant capacity, and the service area's documented need.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
Emergency Solutions Grant (ESG)
Describe the state program addressed by the Method of Distribution.
The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
Applicants to the ESG program are lead agencies representing geographically distributed groups of homeless service providers. These groups are called local continua of care. All lead agencies must complete the ESG application according to guidelines. DOH apportions the funding amongst local continua of care using a formula applied against funding floors established in HEARTH. The formula's elements include a number of measures of homelessness and poverty, as well as measures of the efficiency and effectiveness of individual homeless service providers. Additional variables may be added as additional data becomes available in order to best distribute funding according to the needs of communities and performance of homeless service providers.
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)
<p>The formula described above is used to give each local continua of care an allocation. Each local continuum of care must then prioritize their own local needs and allocate their portion of the funds as they best determine into a Consolidated Application. They then submit their Consolidated Application, which contain their proposed projects and allocations, to their HUD Continuum of Care for approval. If approved by their HUD COC and if there are no problems with their technical review, DOH approves their application and funds the agencies at the level put forth by the local continuum of care.</p> <p>Local continua of care are made of the homeless service providers in each community, including both local units of government and they are nonprofits. Decisions about which agencies receive funding and how much funding they receive are local decisions.</p>
Describe how resources will be allocated among funding categories.
Resources are allocated according to funding floors established by HEARTH and in order to promote best practices and priorities established by the Division of Housing. Local continua of care then decide how to fund agencies within these limitations.
Describe threshold factors and grant size limits.
Grant awards are based on the amount of funding received from HUD, and the funding formula (described above) used to distribute funds to local continua of care.
What are the outcome measures expected as a result of the method of distribution?

State Program Name
Housing Opportunities For Persons With AIDS (HOPWA)
Describe the state program addressed by the Method of Distribution.
HOPWA provides housing assistance and supportive services for income-eligible persons with acquired immunodeficiency syndrome or related diseases, and their families.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.
Selected applicants must be able to provide the full range of HOPWA services statewide, or have formal subcontracts in place with local service providers.
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)
The Division of Housing issues a request for proposal statewide for a project sponsor. The applicant is chosen based on ability to provide HOPWA services statewide, either directly or through subcontracts.
Describe how resources will be allocated among funding categories.
For DOH's HOPWA grant, assistance will be provided for 1) short term rental assistance, 2) associated supportive services, and 3) housing counseling.
Describe threshold factors and grant size limits.
HOPWA funds are received from HUD as a formula grant annually. Funds are awarded to one project sponsor.
What are the outcome measures expected as a result of the method of distribution?

Table 53 - Distribution Methods by State Program

Discussion:

In addition to the programs discussed above, the Division of Housing is committed to working with businesses and other public agencies in order to develop initiatives that will lead to increased stability and long term employment opportunities for targeted group members. While the Division of Housing recognizes that targeted group members have a wide variety of needs, the agency anticipates that its efforts will also be focused on the following areas:

1. Job Training
2. Public Services
3. Regional Economic and Community Development
4. Microenterprises
5. Expansion of broadband infrastructure for low- to moderate-income communities

If enough applications meeting the criteria described in a Division of Housing program are not received in a given action plan year, the Division of Housing reserves the right to redirect the program's unused funds to other programs described in the method of distribution to ensure maximum utilization of funds.

AP-35 PROJECTS – (OPTIONAL)

Introduction

The IDIS table in this section will be filled in and resubmitted after projects have been added.

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in Wisconsin to meet priority housing, business, and infrastructure needs caused by the disasters. The Division of Housing estimates that 20 housing units and 14 public facility/infrastructure projects are still in need of CDBG-DR assistance. Extensive information about disaster recovery needs can be found in the CDBG-DR Action Plans on the Department of Administration Division of Housing website at the following link: <http://www.doa.state.wi.us/Divisions/Housing/CDBG-EAP>

AP-40 SECTION 108 LOAN GUARANTEE – 91.320(K)(1)(II)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No.

Available Grant Amounts

Not Applicable.

Acceptance process of applications

Not Applicable.

Will the state allow units of general local government to carry out community revitalization strategies?

No.

State's Process and Criteria for approving local government revitalization strategies

Not Applicable. The Division of Housing allows all non-entitlement communities to submit applications to programs on a competitive basis.

AP-50 GEOGRAPHIC DISTRIBUTION – 91.320(F)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

The Division of Housing has not chosen geographic target areas as a basis for funding allocation priorities. Rather, DOH allows all non-entitlement communities to submit applications to programs on a competitive basis.

Rationale for the priorities for allocating investments geographically

CDBG: The Division of Housing does not typically award CDBG funds in entitlement communities that receive CDBG funds from HUD directly. CDBG Non-Housing programs typically receive applications from units of local government (UGLGs) across Wisconsin. Applications are reviewed and funded with those projects and areas that will have a significant impact or make a substantial contribution to enhancing the overall economic well-being of the state receiving priority. The CDBG Housing program distributes funds to seven housing regions, and then the regional administrator of each housing region distributes dollars around the region.

HOME: The Division of Housing does not award HOME funds in participating jurisdictions or consortia that receive HOME funds directly from HUD. Rental Housing Development, Homebuyer and Rehabilitation, and Tenant Based Rental Assistance funds are awarded in the rest of the state (not in participating jurisdictions or consortia) on a competitive basis.

ESG: In Wisconsin, the Division of Housing, and the cities of Madison, Milwaukee, and Racine receive ESG funds directly from HUD. DOH ESG funds are awarded on a formula basis to regional entities throughout the state using indicators of poverty and homelessness.

HOPWA: The Division of Housing ensures, currently through its contract with Aids Resource Center of Wisconsin (ARCW), full coverage in the 66 counties in DOH's HOPWA area.

Discussion

AP-55 AFFORDABLE HOUSING – 24 CFR 91.320(G)

Introduction

In the tables below the Division of Housing FY2015 goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing are listed. Affordable housing support will be provided through multiple program activities including, rental assistance, construction of new units, rehabilitation of existing units, and potentially acquisition of existing units. The estimates do not include the provision of homeless services such as emergency shelter, etc.

One Year Goals for the Number of Households to be Supported	
Homeless	200
Non-Homeless	1195
Special-Needs	130
Total	1525

Table 54 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	330
The Production of New Units	47
Rehab of Existing Units	961
Acquisition of Existing Units	187
Total	1525

Table 55 - One Year Goals for Affordable Housing by Support Type

Discussion:

The estimates above are derived from the “Rehabilitate Owner Occupied Housing,” “Rehabilitate Rental Housing,” “Build New Rental Housing,” “Provide Down Payment Assistance to Homebuyers,” and “Provide Tenant-Based Rental Assistance” goals.

Introduction

The Division of Housing will continue to review non-entitlement Annual and 5-Year Public Housing Authority (PHA) Plans to ensure that they are consistent with the Division of Housing's Consolidated Plan.

Actions planned during the next year to address the needs to public housing

Not Applicable.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Not Applicable.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Division of Housing has no administrative authority over Public Housing Authorities. Although the Division does not have any specific responsibility related to addressing SEMAP issues, the Division of Housing staff will continue to serve as resource advisors to the WI Association of Housing Authority board of directors and be available to provide assistance to "troubled" PHAs where feasible.

Discussion:

Introduction

The Division of Housing is committed to preventing and ending homelessness in Wisconsin. Because the Division of Housing has a limited amount of funds available for homeless service programs, it will seek to collaborate with the four HUD Continuum of Care, other state agencies, local governments, nonprofits, and private business in order to work towards these goals. Division of Housing programs will emphasize the use of evidence based practices and efficient uses of funds whenever possible. Further detail is found below and in the AP-20 Annual Goals section.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Centralized or coordinated assessment has the potential to create more efficient homeless service systems by targeting resources toward those who need them most and helping clients move through the system faster. In Wisconsin, coordinated assessment is being implemented at the CoC level. The Division of Housing will continue to require participation in coordinated assessment for their CoC as a part of the ESG program. If the coordinated assessment system is still in the implementation phase, the recipient must participate in its implementation and eventually its use.

The Division of Housing recognizes that street outreach to those experiencing homelessness is necessary in order to engage them and work towards housing stability. The Division of Housing will encourage the use of best practices in street outreach which seek to meet basic needs and engage those experiencing homelessness in a respectful way.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency shelter is a critical part of the homeless service system. Shelters provide temporary refuge and often serve as the “front door” or first place of entry to those experiencing homelessness. As such, it is important that emergency shelters have the ability to connect those experiencing homelessness with the resources needed to exit homelessness using the lightest touch possible. Recently, the Division of Housing measured the performance of emergency shelters using a variety of metrics, including clients served, average length of stay, recidivism, and occupancy rate. The Division of Housing will continue its effort to measure performance and direct more funding towards best performing programs. New transitional housing projects are not funded by the ESG program, but DOH encourages the use of transitional housing in cases where it has been demonstrated to be efficient and effective.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The ESG program requires each local CoC to have a rapid-rehousing program and encourages local CoCs to spend more than the minimum requirement on rapid re-housing programs. Rapid re-housing focuses on quickly moving households out of homelessness and into permanent housing. This has the potential to decrease the length of time participants spend homeless, taking strain off of the shelter system. Case management and other voluntary services provided along with rental subsidy aim to stabilize families so that they can maintain rent payments after rental assistance ends.

Homeless prevention programs are also funded by both ESG and other state funds. These funds allow agencies to keep individuals and families from becoming homeless in the first place. This allows families to avoid potential trauma, upheaval, and an eviction on their record. In order to promote efficient use of funds, the Division of Housing encourages targeting of prevention funds towards those with the greatest need.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Through its involvement with the Interagency Council, the Division of Housing works with the four Wisconsin CoCs and other state agencies which house publically funded systems that may discharge persons into housing instability or homelessness. Collaboration allows DOH and these agencies to work towards discharge planning solutions. Recently, the Division of Housing collaborated with the Department of Children and Families to fund a program targeted at youth who have aged out of the foster care system and are experiencing homelessness or are at risk of homelessness.

Discussion

AP-70 HOPWA GOALS – 91.320(K)(4)

One year goals for the number of households to be provided housing through use of HOPWA for:

Short-term rent, mortgage, and utility assistance payments: 151

HOPWA funds are received from HUD as a formula grant annually. All funds are awarded to one project sponsor who is capable of providing services to the entire HOPWA service area, except for 3 percent administration for the Division of Housing. In response to stakeholder feedback, the Division of Housing funds only short-term rent, mortgage, and utility assistance payments (STRMU). The one-year goal for the STRMU program is 151 households.

Introduction

The Division of Housing's overall strategy to address barriers to affordable housing has been previously discussed in SP-55. Because there is some unavoidable overlap between issues of furthering affordable housing and of fair housing the actions outlined in DOH's 2015-2019 Fair Housing Plan should also be consulted. Below the State's limited legal authority for addressing barriers to affordable housing is explained and DOH planned actions are outlined.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The State of Wisconsin's "home rule" provisions mean that zoning ordinances are left to the judgment of local governments. Sometimes local governments, in an attempt to cover the broad-based costs of public facilities improvements or to slow down a boom in new housing starts, will choose to impose impact fees, increasing lot sizes and setbacks, or establishing minimum square foot requirements for new residences. State statutes do allow local governments to waive impact fees for affordable housing developments, but it is not known how often these fees are actually waived. The net effect of these local actions may make housing more expensive than it would be without the new fees and regulations, which may represent a barrier to affordable housing for people in lower income brackets.

The Division of Housing respects this constitutional policy of local control, and therefore cannot directly intervene to remove barriers to affordable housing that results from a local ordinance's imposition of regulations or fees. The Division of Housing and other state agencies do work to ameliorate barriers to affordable housing in several ways, including:

- Support for the WIHousingSearch.org website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.
- The Division of Housing works to improve the stock of affordable housing in non-entitlement jurisdictions through its state- and federally-funded housing programs.
- The Wisconsin Housing and Economic Development Authority's (WHEDA) Low-Income Housing Tax Credit (LIHTC) program offers a reduction in tax liability to property owners and private investors to encourage the development of affordable rental housing.

Discussion:

AP-85 OTHER ACTIONS – 91.320(J)

Introduction

The Division of Housing plans a number of other actions to address issues related to: obstacles to meeting underserved needs, fostering and maintaining affordable housing, reducing lead-based paint hazards, reducing the number of poverty-level families, developing institutional structure, and enhancing coordination between public and private housing and social service agencies. These are outlined below.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs in Wisconsin is a lack of adequate funding. The Division of Housing will continue efforts to ensure maximum state coverage with program resources. Emphasis will also be placed on enhancing local capacity building and serving disadvantaged and underserved areas.

The Division of Housing will continually evaluate its administration of CDBG funds in order to meet Wisconsin's affordable housing and community and economic development needs. DOH will continue to work collaboratively with units of general local government (UGLGs) so that nonprofit entities and businesses will be able to receive grants, loans and/or equity investments for activities that are allowed under the federal guidelines and best address the needs of the local community.

The Division of Housing will continue proven program approaches as well as efforts to improve strategies and explore more efficient and effective approaches to address community needs with maximum responsiveness, including:

- Collaborate with WHEDA, HUD, USDA Rural Development, and US Department of Commerce-Economic Development Administration to address special housing and community and economic development opportunities and sponsor training and technical assistance for local officials to increase knowledge of and access to available state and federal programs and resources.
- Review current policies and procedures related to maximizing the efficient reuse of program income funds to meet critical needs. DOH will pursue modifications where redirecting resources could address needs in programs with unmet critical needs.

Actions planned to foster and maintain affordable housing

The Division of Housing will continue to fund affordable housing programs through CDBG Housing and HOME funding. These programs fund the construction and rehabilitation of single family and multifamily affordable housing, and provide rental and down payment assistance to lower income households.

The Division of Housing supports the WIHousingSearch.org website. This free online resource provides Wisconsin individuals and families a searchable database of statewide affordable rental housing.

The Division of Housing will meet with the Wisconsin Housing and Economic Development Authority (WHEDA), the administrator of the Low Income Housing Tax Credits, to coordinate affordable housing

resources. Members of WHEDA's staff provide advice to DOH's Rental Housing Development (RHD) program.

The Division of Housing will use Tenant Based Rental Assistance (TBRA) funds in markets where there are rental housing choices for lower income renters and persons experiencing homelessness, but where they are experiencing or would experience a housing cost burden and need temporary assistance with monthly payments.

New units of rental housing will be constructed in markets with a significant number of low income renter households and an insufficient stock of affordable housing units. New owner occupied units may be produced if there is a market and need for the units.

Rehabilitation will be used in markets where there are significant numbers of low income households requiring rental or owner occupied housing and an adequate stock of housing units which could be rehabilitated into decent, safe, and sanitary housing.

The Division of Housing will provide acquisition funds, including preservation, to grantees when demand demographics show that the project will be financially feasible.

Actions planned to reduce lead-based paint hazards

In programs administered by DOH, lead-safe work practices will be used in pre-1978 units. The types of lead-safe work to be completed include paint stabilization, window and door replacement, and exterior treatments to include siding and porch repair and/or replacement. The DOH, the Department of Housing and Urban Development, the Division of Energy Services and the Division of Public Health (Department of Health Services) will work together to offer training to interested parties. Contractor and risk assessor training opportunities will be communicated to interested parties through current Division of Housing CDBG, ESG, Supportive Housing, and HOME grantees as well as through local housing authorities.

Lead Risk Assessments will be conducted on units at the sub-recipients discretion. These decisions are made based on the age of the property, extent of paint and varnish deterioration, and unit occupants. Wisconsin will continue to seek resources at the state and local level to address identified lead hazards in priority housing. Risk assessors certified by the DHS Division of Health conduct risk assessments in eligible housing units and certified abatement contractors carry out the lead hazard reduction activities.

Actions planned to reduce the number of poverty-level families

A number of grantees require their recipient households, as a condition of assistance, to become as self-sufficient as possible. The Division of Housing encourages the development of self-sufficiency components within an applicant's program design. Through these efforts, the Division seeks not only to stabilize households in crisis but also to reduce households' dependence on public assistance and to begin developing pathways out of poverty.

The Projects for Assistance in Transition from Homelessness (PATH) initiatives are linking up with other homeless and housing activities in targeting individuals experiencing serious mental illness and homelessness, resulting in greater self-sufficiency for participants.

DOH supports the Wisconsin Fresh Start program that leads at-risk young people to self-sufficiency. This highly successful program, representing a collaborative effort with other state agencies, federal partners, local organizations and the private sector has generated a success rate of over 70%.

DOH and WEDC will continue collaborative efforts with WHEDA and USDA-RD to help local communities, particularly in rural areas, be aware of programs available to them and ways to leverage dollars to maximize both the impact of program dollars and the quality of housing and community development.

In the Public Facilities for Economic Development Program and Economic Development Programs, priority will continue to be given to those projects that produce high wages and offer decent health insurance where the employer pays more than half the cost of the premiums. High wages are defined as an hourly amount that will provide for disposable income for a household after meeting basic shelter, food and health costs.

Actions planned to develop institutional structure

The need for CDBG housing and community development projects continues to exceed available funding. The allocation of CDBG funds that will occur in Program Year 1 will allow the Division of Housing to focus needed resources on housing and public facility projects without adversely affecting the Division's ability to support appropriate economic development projects.

The Division of Housing also has HOME programs to complement existing networks of service providers. DOH continues its long-term support of stable non-profit organizations that provide services in areas covering most of the state. Collaborative efforts among local agencies are strongly encouraged. Training and technical assistance continue to improve the delivery of housing and homeless assistance.

The Department of Administration's Division of Energy provides weatherization assistance. Many of their grantees also administer DOH HOME program activities. Activities consist of attic and sidewall insulation, air infiltration reduction, and water heater replacements. The Low Income Home Energy Assistance Program assists households with heating assistance, emergency fuel assistance, counseling for energy conservation and energy budgets, and emergency furnace repair and replacement. Coordinated efforts and referrals are on-going.

Actions planned to enhance coordination between public and private housing and social service agencies

In addition to the connections with WHEDA noted in several places in the Plan, DOH staff members will work with these other state agencies and entities:

- USDA – Rural Development housing
- Interagency Council - Agencies involved with homelessness include Homeless Continuum of Care entities, the Departments of Health Services, Veterans Affairs, Workforce Development, Children and Families, Corrections, Public Instruction, as well as representation by homeless service providers.
- Wisconsin Economic Development Corporation.
- The Wisconsin Council on Mental Health (interagency forum that includes housing needs of mentally ill persons)
- Department of Natural Resources (water/sewer connection funding in rural areas)

- Council of State Community Development Agencies (COSCDA)
- Department of Health Services (transitional and permanent housing for elderly persons and persons with physical, sensory, behavioral and developmental disabilities, and lead-based paint hazard programs).
- University of Wisconsin-Extension (tenant and homebuyer education)
- Department of Administration Division of Energy
- Other State Agencies (building code review, business development)
- State Historical Society of Wisconsin (Federal Section 106 review process)
- Wisconsin Council on Physical Disabilities
- National Alliance on Mental Illness of Wisconsin (NAMI WI)
- Refugee Network
- Inter-Tribal network
- Main Street Communities
- Statewide Independent Living Council
- Weatherization Operators of WI
- WI Community Action Programs Association
- WI Association of Housing Authorities
- Wisconsin Waste Siting Board
- Wisconsin Department of Transportation
- Wisconsin Rural Water Association
- Wisconsin Economic Development Association

DOH staff members will participate in the following coalitions of public- and private-sector housing organizations:

Wisconsin Collaborative for Affordable Housing This group covers information-sharing and training issues. It includes representatives from Legal Action of Wisconsin, HUD's Wisconsin Field Office, Wisconsin Association of Housing Authorities, Wisconsin Community Action Program Association, Wisconsin Partnership for Housing Development, WHEDA, USDA and other housing organizations and local governments.

Wisconsin Fair Housing Network This coalition focuses on fair housing education and promotion. Its membership includes representatives from the Wisconsin Equal Rights Division, Department of Safety and Professional Services, HUD's Wisconsin Field Office, WHEDA, Wisconsin Realtors Association, local boards of Realtors, equal opportunity commissions, fair housing councils, community housing resources boards and landlord and apartment associations.

Childhood Lead Poisoning Committee A collaboration of public and private entities dedicated to eliminating lead based paint hazards in housing. A strategic plan was adopted in 2004 and updated in 2006. Implementing and evaluating the Elimination Plan is actively ongoing.

Wisconsin Fresh Start Projects DOH in cooperation with other state and federal agencies, replicates the Operation Fresh Start (OFS) program model to provide at-risk young people with education, employment skills, and career direction leading to economic self-sufficiency. This is accomplished through meaningful service including constructing housing for low-income families. Funds are currently provided from the DOH HOME-HHR program, the Department of Corrections' Division of Community Corrections, and other sources.

Interagency Workgroup Federal, state, and local agencies and nonprofits involved with homelessness meet during the year to discuss homelessness and related housing and service issues.

Discussion:

AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.320(K)(1,2,3)

Introduction

In this section the Division of Housing addresses various program specific requirements and how it complies with federal regulations. This section provides a calculation of total program income, and also includes a discussion of the guidelines followed in the oversight of local revolving loan funds and establishment of 105(A)(15) nonprofit entities.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	17,000,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	17,000,000

Other CDBG Requirements

1. The amount of urgent need activities	2
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	85%
Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	1

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)

A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The Division of Housing utilizes only forms of investment included in Section 92.205.

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Division of Housing's HOME-HHR implementation manual provides the following guidelines for the resale or recapture of HOME funds:

Certain restrictions must be placed on assisted homebuyer properties in order to help preserve affordable housing. If ownership of a property is transferred during the affordability period, these provisions are triggered.

Grantees have two options to ensure that the HOME subsidy originally invested in the property is used to preserve affordable housing: recapture or resale. Except when a grantee project consists of development subsidies only, with no direct subsidy to the homebuyer, then the grantee must use the resale provision since development subsidies are not subject to recapture.

RECAPTURE: These provisions apply when direct assistance is provided to the homebuyer. Recapture is a mechanism to recapture all or a portion of the direct HOME assistance if the recipient decides to sell the house within the affordability period at whatever price the market will bear.

Under this option, the grantee may require the homebuyer to repay all of the HOME assistance received or may forgive part or all of the assistance over the term of the affordability period. The amount of repayment required and method of calculating the amount of repayment (if only partial repayment is required) must be clearly outlined in the written agreement with the homebuyer.

Forgiveness must be tied to the length of time the homebuyer has occupied the home in relation to the period of affordability (i.e., the grantee would forgive 50% of the assistance amount for an owner who sold the home half-way through the period of affordability).

Net proceeds: When the net proceeds are not sufficient to repay the direct HOME assistance and the homebuyer's investment, the net proceeds may be shared in either of two ways:

1. Recapture may be based on the ratio of the HOME assistance to the sum of the homeowner's investment (down payment and any capital improvement investment made by the owner since purchase), plus the HOME subsidy:

$$[\text{HOME \$}/(\text{HOME \$} + \text{Homeowner Investment})] \times \text{Net Proceeds} = \text{Recapture}$$

2. The homeowner's investment may be repaid in full before any HOME funds are recaptured. The grantee may choose to use the available proceeds from the resale to repay the homeowner's investment first. The HOME assistance is then repaid to the extent that proceeds are available.

RESALE: This option ensures that the HOME-assisted property remains affordable for the entire period of affordability.

If the unit is sold during the period of affordability, the sale must meet the following criteria: The new purchaser must be LMI and occupy the property as the family's principal residence. The sales price must be "affordable" to the new purchaser. Affordable is defined by the grantee. Many times affordable is defined as a maximum percentage of the purchaser's income that can be used to pay the fixed costs of owning a home (i.e., loan payment of principal and interest, taxes and insurance--PITI.)

Grantees must use deed restrictions or land covenants to enforce the resale restrictions.

A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

A period of affordability of units acquired with HOME funds will be followed per CFR 92.254(a)(4) and as outlined by the guidelines in the previous answer.

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

DOH does not intend to use its HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

Emergency Solutions Grant (ESG)

Reference 91.320(k)(3)

Include written standards for providing ESG assistance (may include as attachment)

The Division of Housing recognizes that flexibility is needed in order to best serve various homeless populations in various areas of the state. Recipients and subrecipients of ESG funding must adhere to their area's HUD COC established written standards for each program type. If no such standards are established by the HUD COC, the recipient or subrecipient must develop and consistently apply written standards. The standards must provide a clear policy or instruction for the items listed in (24 CFR § 576.400 (e)(3)).

If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Each local continuum of care is required to develop and/or operate a centralized or coordinated intake or assessment system if any agencies in the continuum of care receive ETH funding. Recipients and subrecipients must participate in the centralized intake for their continuum of care. If there is not yet a centralized intake, a recipient or sub-recipient must participate in its implementation and eventually its use.

Identify the process for making sub-awards and describe how the ESG allocation available to private

nonprofit organizations (including community and faith-based organizations).

ESG funds will continue to be distributed to one fiscal agent in each HUD or local continuum of care on behalf of all project applicants in that continuum. The continuum of care will be pre-defined, based on historical partnership for previous grant competitions within the Bureau of Supportive Housing, the HUD COC process and geographic proximity.

Each HUD or local continuum of care will decide how best to allocate funding to participating agencies by considering local needs, program performance and parameters as laid out through HEARTH and grant program rules.

If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

To the maximum extent practicable, the recipient and subrecipients will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted by ESG.

Describe performance standards for evaluating ESG.

ESG funding is allocated using a funding formula which takes into account factors such as regional homelessness, poverty levels, and other indicators of the extent of homelessness in each HUD and local Continuum of Care. Recently, the Division of Housing created a performance measure to include in the funding formula, which incentivizes efficient and effective use of ESG funds. The ESG program will continue to measure the performance of recipients and sub-recipients and encourage the use of evidence based practices in service delivery.

HOPWA

HOPWA funds are received from HUD as a formula grant annually. All funds are awarded to one project sponsor who is capable of providing services to the entire HOPWA service area, except for 3 percent administration for the Division of Housing. Due to stakeholder feedback, the Division of Housing funds only short-term rent, mortgage, and utility assistance payments (STRMU). The one-year goal for the STRMU program is 151 households.

Discussion:

LOCAL REVOLVING LOAN FUNDS (RLF)

Under the Housing and Community Development Act (HCDA), the Division of Housing is allowed broad authority to reclaim program income from local units of government. The only identified exception is found in Section 104(j) of the Act, i.e., to continue the same activity.

In accordance with the above definition, the Division of Housing has broad authority to reclaim program income. Notwithstanding such authority, DOH has historically recognized the value of allowing units of general local government (UGLG) to retain all or a portion of program income to establish Revolving Loan Funds (RLF). In fact, today there are over a hundred local RLFs operating throughout the state. However, the Division of Housing will exercise its authority to reclaim program income in cases when an UGLG is not utilizing its RLF funds. This will allow the funds to be redistributed by the Division of Housing to fund additional CDBG activities for UGLGs in need of immediate funding. Because of the inherent differences between housing rehabilitation and economic development activities, the amount of time allowed to UGLGs to utilize its RLF funds will differ between housing rehabilitation and economic development RLFs. If an UGLG does not utilize economic development or housing rehabilitation RLF funds within a reasonable amount of time at the discretion of the Division of Housing, the funds must be returned to the Division.

Cognizant of the administrative burden associated with monitoring all aspects of CDBG compliance for each of the aforementioned RLFs, the Division of Housing will continue to implement strategies to expand the utilization of nonprofit entities to carry out eligible activities under Section 105(a)(15) of the Act. Such activity includes encouraging UGLG to undertake planning activities targeted toward the creation of self-defined regional economic development corporations, adopting policies and developing strategies necessary to implement comprehensive community development initiatives and/or the establishment of a statewide economic development corporation.

In accomplishing this plan, the Division of Housing will build upon the guidelines contained in HUD Notice: CPD-04-11. Specifically the information contained in:

SECTION IV: ACTIVITIES CARRIED OUT BY 105(A)(15) NONPROFIT ENTITIES. WHICH STATES:

Section 105(a)(15) of the HCDA allows as eligible the provision of assistance to neighborhood-based nonprofit organizations, local development corporations, and nonprofit organizations serving the development needs of communities in non-entitlement areas to carry out neighborhood revitalization, community economic development or energy conservation projects. According to 24 CFR 570.489(e)(2)(ii), "amounts generated under Section 105(a)(15) of the Act and carried out by an entity under the authority of Section 105(a)(15) of the Act" are not considered program income.

States seeking to minimize the amount of funds that must be treated as program income could take advantage of this exception by encouraging UGLGs to form sub-grantee relationships with local nonprofit organizations to administer Revolving Loan Funds (RLFs). In this scenario, the state would grant funds to an UGLG, which would then pass the funds to a nonprofit organization, such as a community development corporation (CDC). The CDC would then use those funds to make loans, such as for business expansion or housing rehabilitation. If the repayment of that loan is made to the nonprofit organization and the nonprofit retains the repayments for further use, repayments are not considered program income; subsequent loans by the nonprofit entity using those funds do not have to meet any Federal requirements. However, the state or UGLG could still establish requirements for re-use of the funds-or even require some CDBG requirements to be followed through grant agreements between the UGLG and the 105(a)(15) entity. HUD encourages grantees to ensure that subsequent revenue is expended on community development needs.

In pursuing this objective, the Division of Housing is utilizing pilot regions and developing the model agreements necessary to ensure that the nonprofit entities are adequately formed and capable of carrying out eligible activities (loans, equity investments, etc.) in an acceptable manner.

APPENDIX A: CITIZEN PARTICIPATION PLAN



State of Wisconsin
Department of Administration

CITIZEN PARTICIPATION PLAN

**produced in conjunction with the State of
Wisconsin's Consolidated Plan for April 1,
2015 through March 31, 2020**

State of Wisconsin ■ Scott Walker, Governor
Department of Administration ■ Scott Neitzel, Secretary

INTRODUCTION

This document outlines the Division of Housing's responsibilities for obtaining citizen participation in the process of preparing, amending, and updating its Consolidated Plan.

The Consolidated Plan details Wisconsin's housing and community development needs, the strategies the Division of Housing will undertake to address these needs, and the annual action plan for the first and subsequent years that the Plan is in effect.

The Consolidated Plan serves as the State of Wisconsin's application to the U.S. Department of Housing and Urban Development (HUD) for program funds of the Small Cities Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons With AIDS (HOPWA). A number of cities and metropolitan counties¹ within Wisconsin prepare their own Consolidated Plans.

The state agency responsible for preparing the Consolidated Plan is the Department of Administration's Division of Housing (DOA-DOH). It administers the CDBG, ESG, HOME, and HOPWA programs.

The agency contact for the Consolidated Plan and this Citizen Participation Plan is:

Ms. Lisa Marks, Administrator, Division of Housing
Wisconsin Department of Administration
101 E. Wilson St. P.O. Box 7970
Madison, WI 53707-7970
(608) 267-0770/(608) 266-5381 (FAX)

¹ Appleton, Beloit, Eau Claire, Fond du Lac, Green Bay, Janesville, Kenosha, La Crosse, Madison, Milwaukee, Milwaukee County, Neenah, Oshkosh, Racine, Sheboygan, Superior, Waukesha County, Wausau, Wauwatosa, and West Allis.

PARTICIPATION IN DEVELOPMENT OF CONSOLIDATED PLAN

The Division of Housing shall provide for and encourage local government, agency, and citizen participation in the development of its Consolidated Plan. The Division of Housing shall undertake the following actions in these areas.

Encouragement of Participation—General

The Division shall encourage participation in the development of its Consolidated Plan through the following means as appropriate:

- 1) Mass mailing paper copies or emailing electronic copies of notices to the assembled distribution lists of the Division of Housing and local unit of government clerks;
- 2) Notices to the various media outlets;
- 3) Listening sessions and information dissemination at statewide affordable housing and homeless conferences and other relevant events;
- 4) Organizing a webinar;
- 5) Posting of public notices concerning the Consolidated Plan on the Internet at the Wisconsin DOA-DOH website;
- 6) Online Consolidated Plan survey and comment opportunity on the State of Wisconsin DOA-DOH website.

Participation of Nonentitlement Municipalities and Other Units of Government

The Division of Housing shall notify nonentitlement municipalities and other units of government directly by email of the Consolidated Plan's development process.

The Division of Housing shall solicit ideas regarding the distribution method and priorities for housing and community development funds annually at related conferences and events. The target audiences are nonentitlement units of government, housing agencies, economic development associations, consultants, homeless and special needs service providers. The Division of Housing may engage the committee process when soliciting comments and input regarding program design.

Participation of Public and Private Agencies

Public and private sector agencies that provide assisted housing, health services, social services, and economic development shall receive notification by mail or email of the Consolidated Plan's development process. The Division shall encourage written comments and attendance at listening sessions and public hearings and use of the Wisconsin DOA-DOH

website. In addition, the Division shall work with representatives from public and private agencies to help with data analysis and to provide feedback on Wisconsin's housing and community development needs and potential solutions.

Public and quasi-public agencies include: the WEDC, the Wisconsin Housing and Economic Development Authority; the Departments of Health Family Services, Children and Families, Administration, Veterans Affairs; and Corrections, the University of Wisconsin, USDA Rural Development, and local county or nonprofit economic development associations.

Private agencies include grantee and applicant organizations of the Division of Housing which are located throughout the state, and statewide agencies such as: Foundation for Rural Housing; Wisconsin Community Action Program Association; and the Wisconsin Association of Housing Authorities.

Participation of Citizens

The Division of Housing shall encourage the participation by Wisconsin's citizens in the Consolidated Plan's development process. In order to maximize the participation of citizens of low income, with mobility or other impairments, or with a language barrier, the Division shall, in addition to the steps outlined above:

- 1) Provide an online Consolidated Plan survey on the Wisconsin DOA-DOH website to capture comments and recommendations for Consolidated Plan programs and priorities.
- 2) Notify through mail or email the availability of the online survey for the Consolidated Plan development.
- 3) Schedule hearings and forums at times and locations that are convenient to potential and actual beneficiaries.
- 4) Ensure that hearing and forum sites can accommodate persons with mobility impairments (the advertisement mentioned above will include this information).
- 5) Arrange for special communication accommodations, if notified by potential participants at least one week prior to the public hearing.
- 6) Accept comments via email and TTY.

Access to Information

The Division of Housing shall make available to units of local government, citizens, agencies, and other interested parties information on the amount of anticipated revenue for housing and community development activities for the following year. Furthermore, the Division of Housing shall make available information on its proposed range of activities, including the estimated

amounts of funds that are proposed to assist residents by income category (extremely low (less than 30% of median family income), very low (31-50% of median family income), and low (51-80% of median family income)). Finally, the Division of Housing shall address any displacement that its activities would create, and provide information on the steps to assist those displaced. This information will be available upon request.

Publication of Proposed Consolidated Plan

The Division of Housing shall have the proposed Consolidated Plan available in print and by electronic means on the Internet.

The public comment period for the proposed Consolidated Plan will be at least thirty days. The Division of Housing shall publish a notice of the availability for comment in the Wisconsin State Journal on or before the first day of the comment period.

The Division of Housing shall publish a notice in the Wisconsin State Journal. This notice will include how the public can obtain copies or examine the proposed Consolidated Plan.

The Division of Housing shall mail printed copies of the proposed Consolidated Plan to the main branches of the public libraries in the following communities: Appleton, Eau Claire, Green Bay, La Crosse, Madison, Marinette, Milwaukee, Platteville, Racine, Rhinelander, Rice Lake, Richland Center, River Falls, Superior, and Wausau.

The Division of Housing shall also make copies available free of charge to the public, both in printed form and by electronic means. A reasonable number of copies will be printed; if that supply is exhausted, the Division of Housing shall provide additional copies in electronic form only.

Comments on Consolidated Plan programs should be sent to the Division of Housing, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Housing shall consider the comments it receives during the comment period as it prepares the final Consolidated Plan. The Division of Housing shall append a summary of these comments, both those accepted and those rejected, to the final Consolidated Plan.

AMENDMENTS TO THE CONSOLIDATED PLAN

Criteria for Substantial Amendments

The Division of Housing considers a substantial change in the method used to distribute CDBG, HOME, ESG, and HOPWA funding as described in the annual action plan to constitute a substantial amendment. If enough applications meeting the criteria described in a Division of Housing program are not received in a given action plan year, the Division of Housing reserves

the right to redirect the program's unused funds to other programs described in the method of distribution to ensure maximum utilization of funds without a substantial amendment.

Prior to the submission of a substantial amendment to HUD, the Division of Housing shall publish notice of its intention to make the substantial amendment in the Wisconsin State Journal. The text of the proposed substantial amendment will be available from the Division of Housing.

The comment period will be not less than 30 days in length unless the Department of Housing and Urban Development waives the 30-day comment period. The Division of Housing shall consider any comments or views received when preparing the final version of the substantial amendment.

Comments should be sent to the Division of Housing, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Housing shall append a summary of these comments, both those accepted and those rejected, to the final version of the substantial amendment.

PERFORMANCE REPORTS

Prior to the submission of its annual performance report to HUD, the Division of Housing shall publish notice of its availability for comment in the Wisconsin State Journal. The draft annual performance report will be available from the Division of Housing. The comment period will be not less than fifteen days in length. The Division of Housing shall consider any comments or views received when preparing the final version of the report. The Division of Housing shall append a summary of these comments to the final version of the report.

Comments should be sent to the Division of Housing, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970

ACCESSIBILITY OF CONSOLIDATED PLAN, AMENDMENTS, AND PERFORMANCE REPORT TO PUBLIC

Availability of Documents

The Division of Housing shall make available to the public the final Consolidated Plan, any substantial amendments, and annual performance reports. Copies will be available in printed form or electronic means.

Interested parties should request printed or electronic copies from the Division of Housing, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Housing shall make these materials also available in a format for persons with disabilities upon request.

Access To Records

The Division of Housing shall make available to citizens, public agencies, and other interested parties its records relating to the Consolidated Plan, and the use of assistance under this Plan. The Division of Housing may provide certain data, if voluminous, only in summary format. Any information released will protect the confidentiality of program beneficiaries.

The Division of Housing shall make an effort to respond to requests for records within fifteen working days.

The Division of Housing shall maintain such records for a period of five years.

Interested parties should request records on the CDBG, HOME, ESG, and HOPWA programs from the Division of Housing, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

CITIZEN PARTICIPATION REQUIREMENTS FOR LOCAL GOVERNMENTS (CDBG PROGRAM)

Units of general local government applying for CDBG funding must adhere to the citizen participation requirements promulgated in the Code of Federal Regulations, Part 24, Section 570.486 (24 CFR §570.486). Specifically, the Division of Housing shall require that local governments:

- 1) adopt a resolution in support of a citizen participation plan that is in conformance with 24 CFR §570.486;
- 2) include the citizen participation plan in its CDBG application materials;
- 3) provide evidence (e.g., sign-in lists for public hearings) that elements of the citizen participation plan were followed in the preparation of its CDBG application.

COMPLAINTS

The Division of Housing shall accept any complaint concerning the Consolidated Plan, substantial amendments, and annual performance reports. Complaints should be in written form and should be mailed to:

Division of Housing, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970

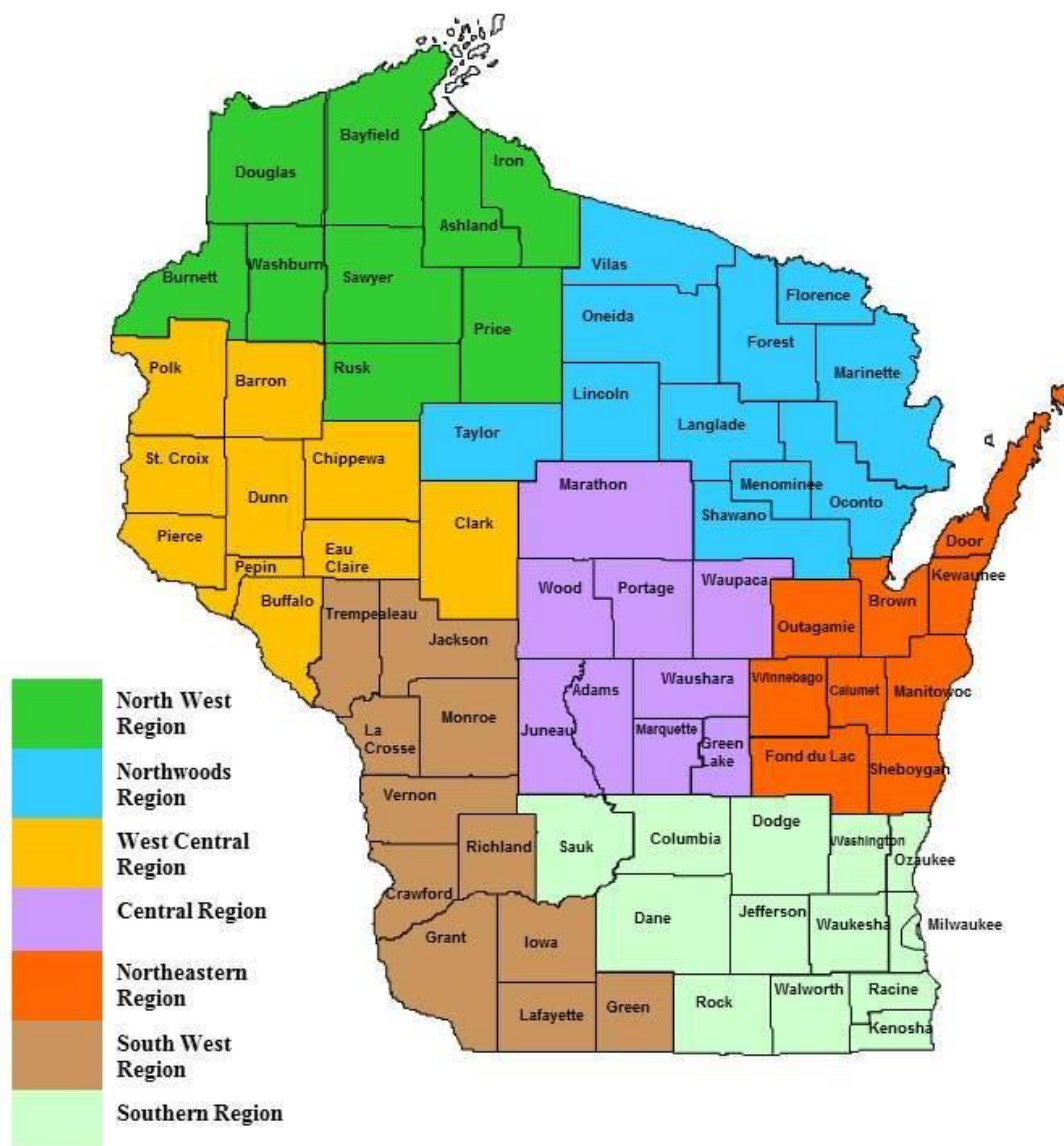
The Division of Housing shall respond to complaints in writing within fifteen working days. Complaints should be addressed to the Division of Housing, Department of Administration no later than one year after their comment period expires.²

² Editing note: The Final Rule is silent on the length of time within which complaints should be accepted. Given that amendments are generally issued annually and the action plan is updated annually, a one-year limit on complaints is a reasonable time standard.

APPENDIX B: ONLINE PUBLIC SURVEY RESULTS

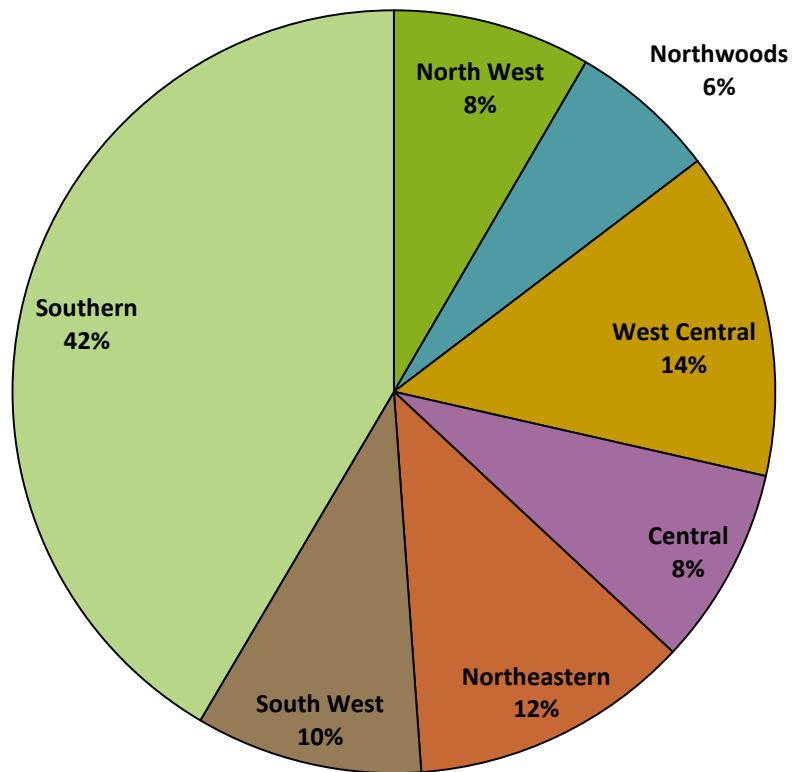
Introduction

As part of the Wisconsin 2015-2019 Consolidated Plan, the Department of Administration's Division of Housing conducted an online public survey in order to gather feedback from Wisconsin citizens. The survey was open during the month of July, and had 655 respondents (not all respondents answered every question). Following is a summary of the results, which were used in the development of the Wisconsin 2015-2019 Consolidated Plan.



General Questions

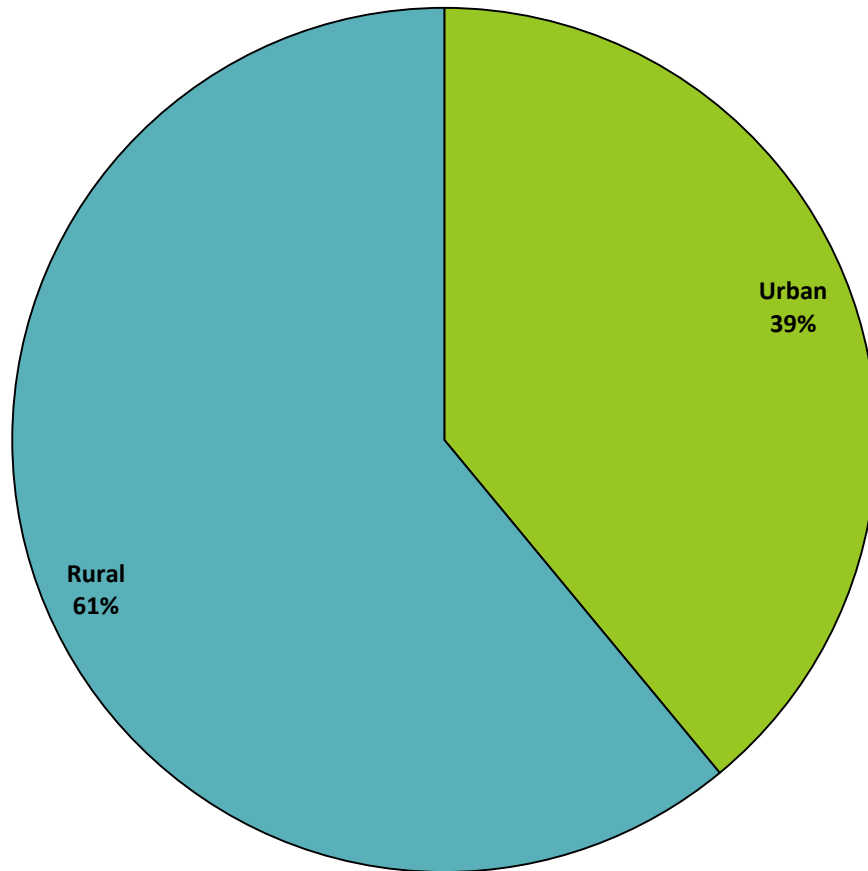
1. Indicate the region of Wisconsin where you live (required).



	Response Total	Response Percentage
North West	55	8%
Northwoods	41	6%
West Central	91	14%
Central	55	8%
Northeastern	78	12%
South West	63	10%
Southern	272	42%
Total	655	100%

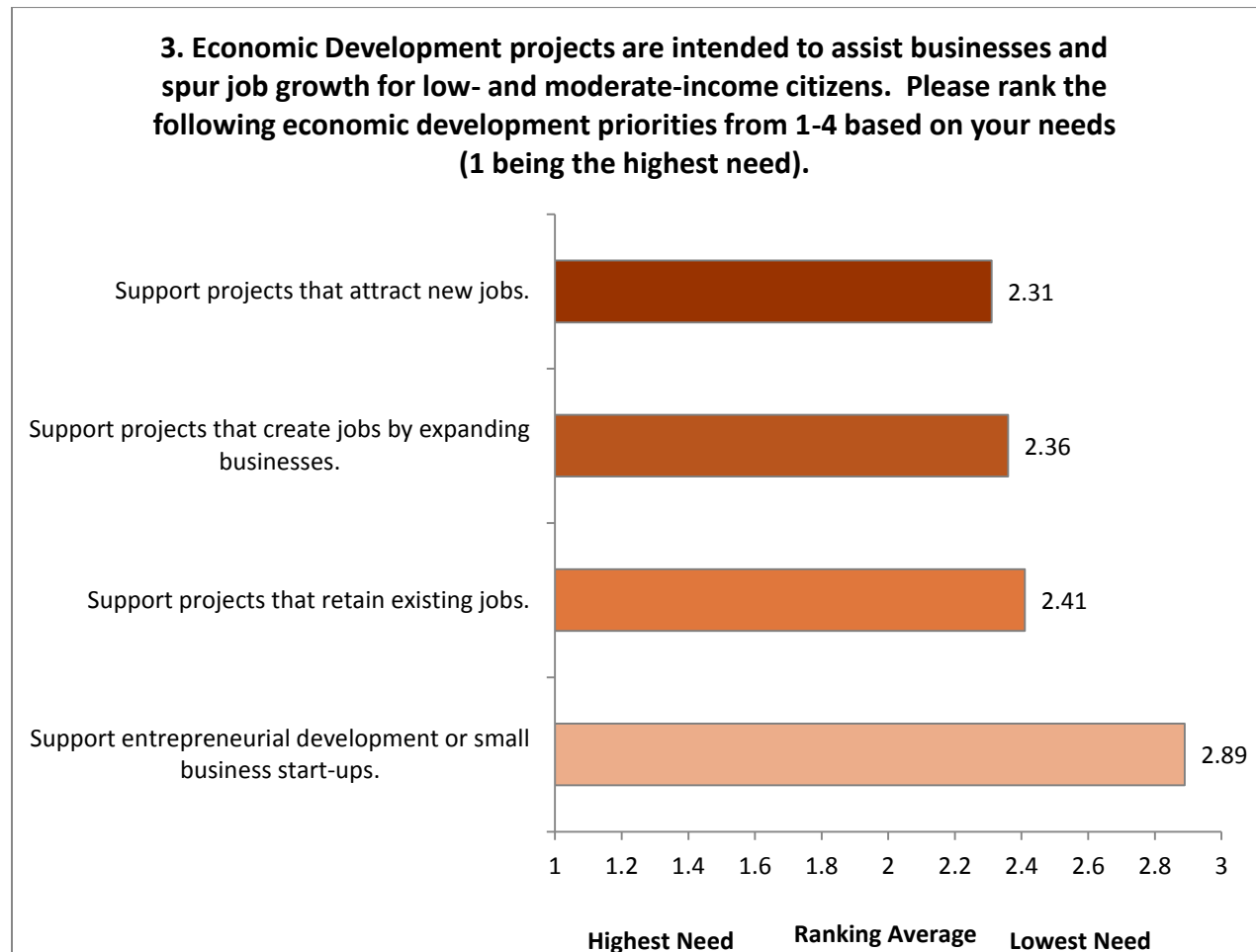
General Questions

2. Indicate if you represent a primarily urban (at least 50,000 people) area or rural area (required).



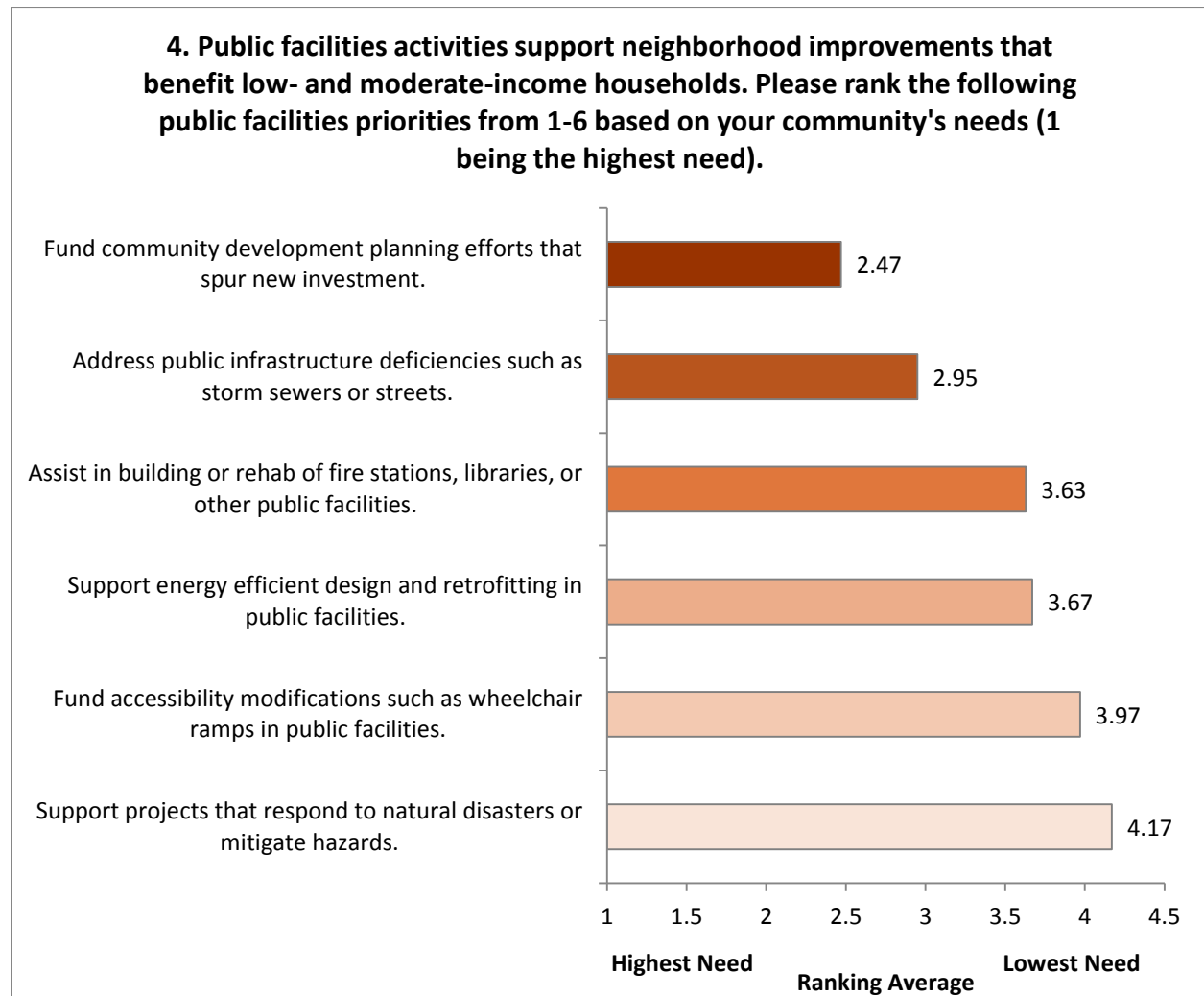
	Response Total	Response Percentage
Urban	257	39%
Rural	398	61%
Total	655	100%

Economic/Community Development Needs and Priorities



Total Respondents: 452

Economic/Community Development Needs and Priorities



Total Respondents: 446

Economic/Community Development Needs and Priorities

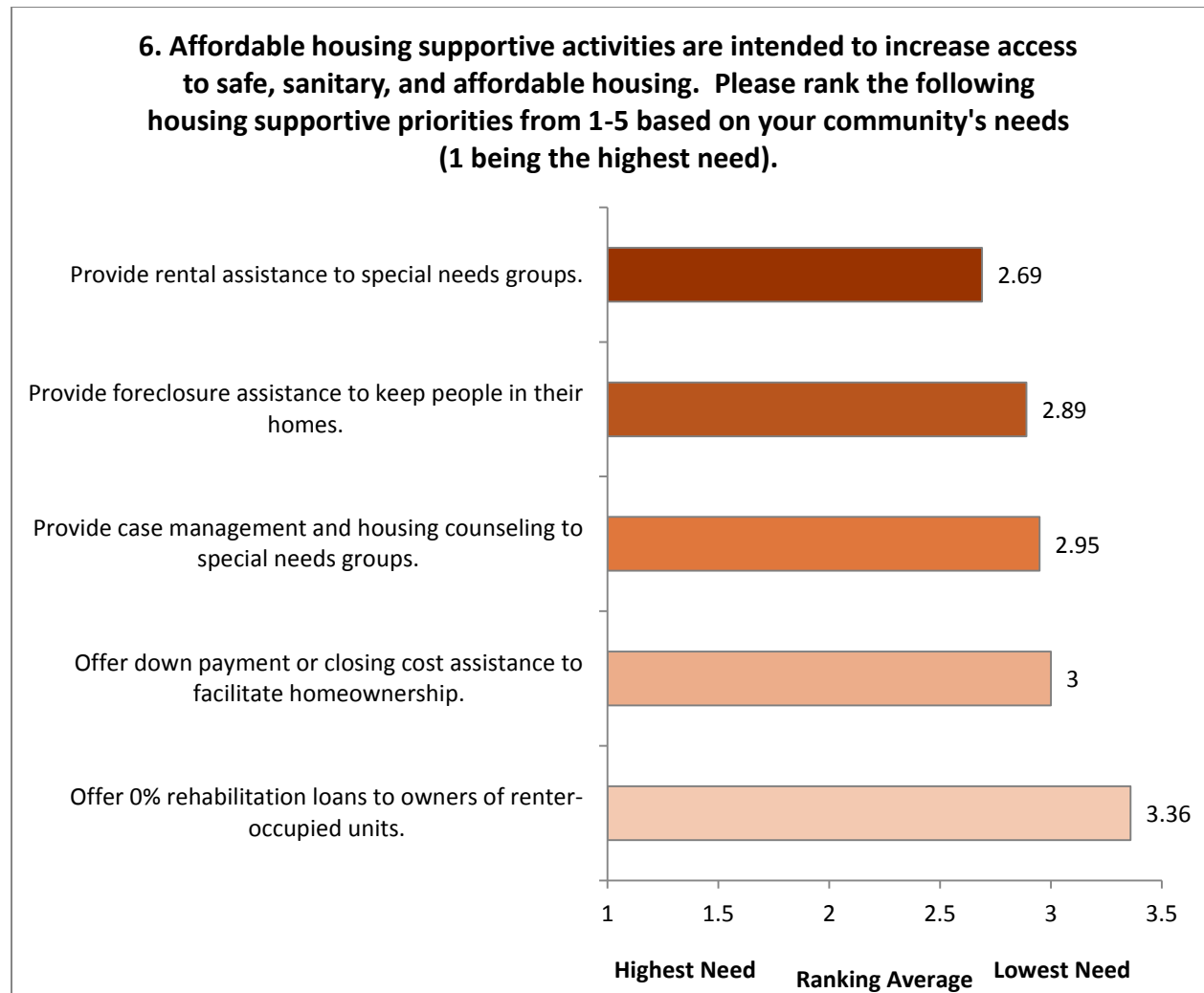
The following question was answered in a narrative format by respondents. In order to summarize the responses for this report, responses were grouped by category. Categories consist of responses that came up multiple times among respondents. Responses that addressed more than one category were grouped in multiple categories. Responses that did not fit any of the categories were considered by the Division of Housing, but were not included in this summary report.

5. What is the largest barrier to economic and community development in your community and how can the Division of Housing better utilize limited funds to assist in overcoming this barrier?

Barrier to Community and Economic Development/How the Division of Housing can Assist Communities.	Number of Times Issue was Mentioned by Respondents
Lack of jobs or living wage jobs/Living wage jobs are needed	80
Lack of affordable housing/More affordable housing needed	64
Lack of funding/More funding needed	39
Lack of transportation/Transportation options needed	30
Funding restrictions or regulations hinder community development	24
Rehabilitation of structures or neighborhoods needed	22
Job training needed to address skills gap	20
Education of Leaders needed	16
Physical infrastructure is needed or deteriorating	15
Accessibility for those with disabilities is needed	8
Individual barriers to employment (such as criminal record) hindering employability	7
Area has large senior population in need	6
Coordination among various government entities is needed	6
Case management is needed	5
Need funds for planning of development projects	4
Community opposes projects	3

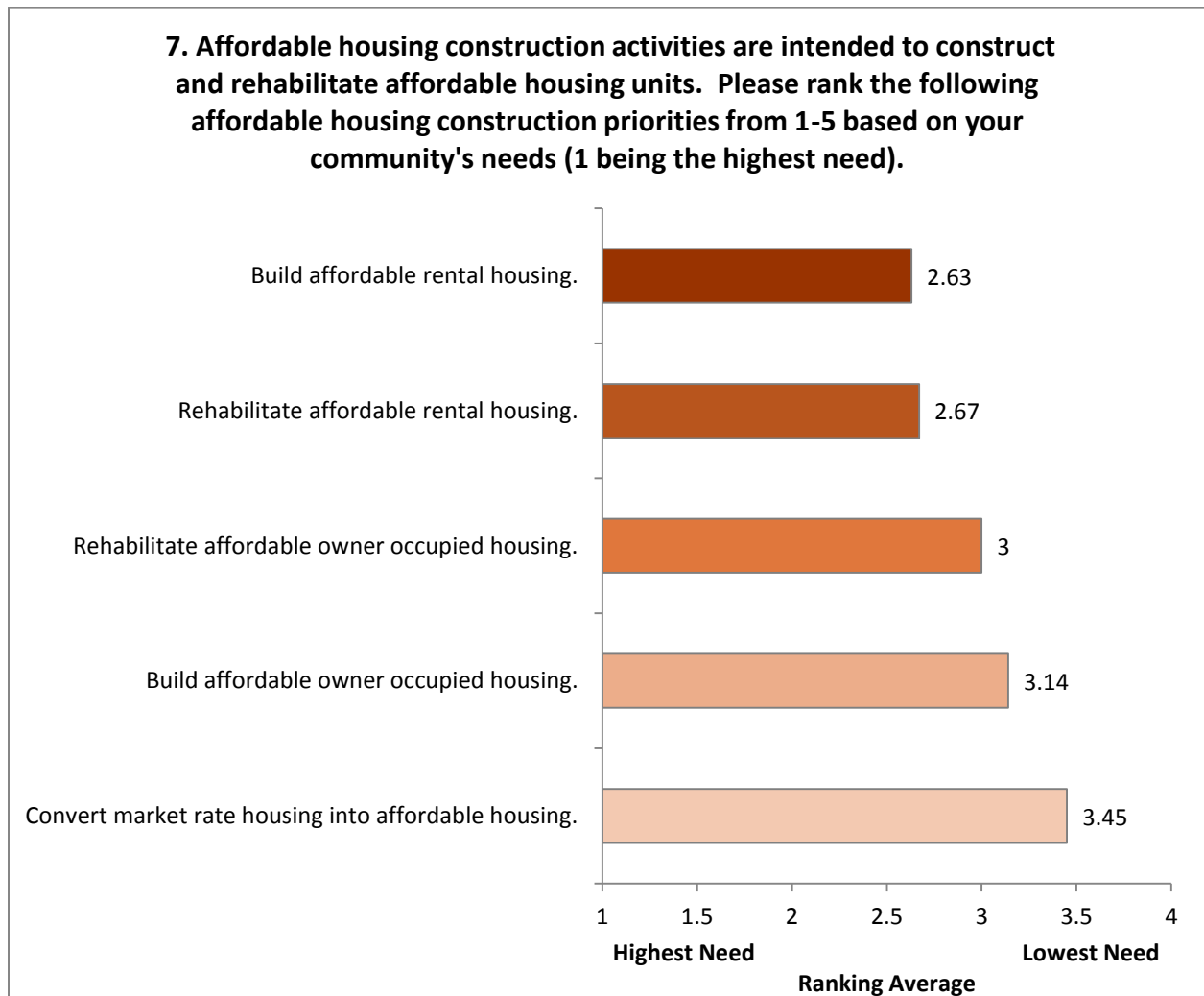
Total Respondents: 352

Affordable Housing Needs and Priorities



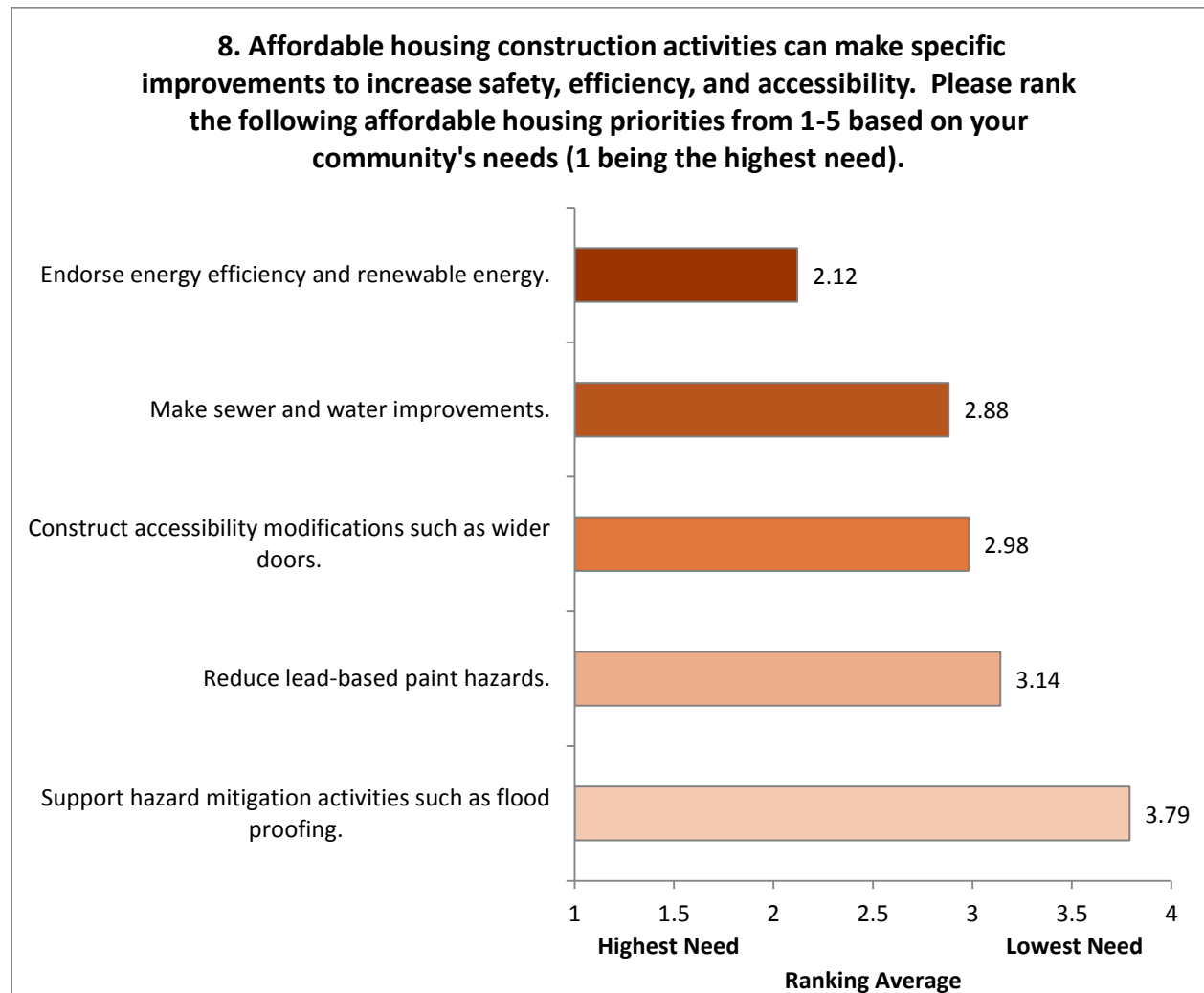
Total Respondents: 408

Affordable Housing Needs and Priorities



Total Respondents: 406

Affordable Housing Needs and Priorities



Total Respondents: 403

Affordable Housing Needs and Priorities

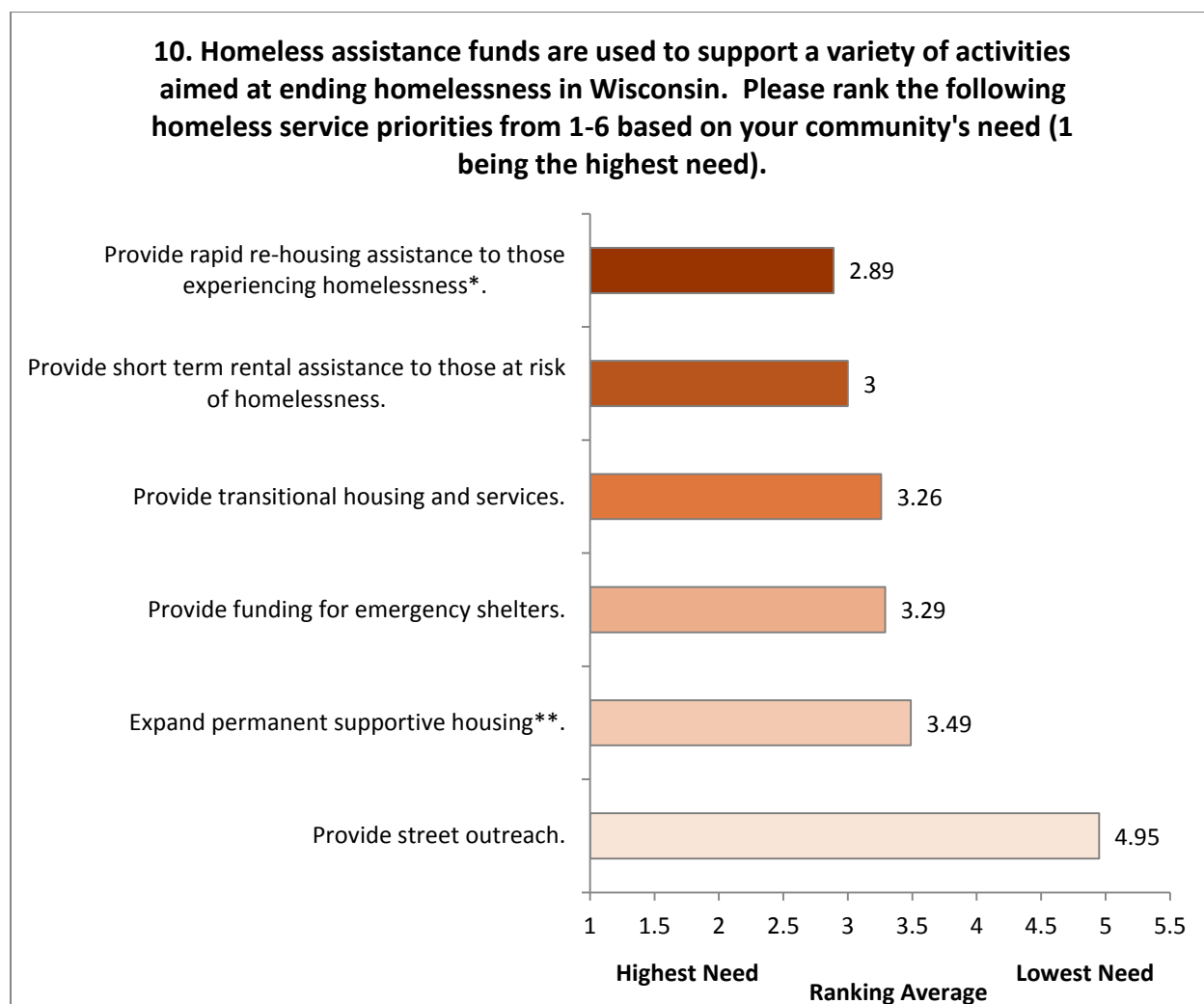
The following question was answered in a narrative format by respondents. In order to summarize the responses for this report, responses were grouped by category. Categories consist of responses that came up multiple times among respondents. Responses that addressed more than one category were grouped in multiple categories. Responses that did not fit any of the categories were considered by the Division of Housing, but were not included in this summary report.

9. What is the largest barrier to affordable housing in your community and how can the Division of Housing better utilize funds to assist in overcoming this barrier?

Barrier to Affordable Housing/How the Division of Housing can Assist Communities	Number of Times Issue was Mentioned by Respondents
Lack of affordable housing is the issue/More affordable housing needed	85
Affordable housing stock is aging and in substandard condition/Rehabilitation funds are needed	54
Living wage jobs are needed so that households can afford housing costs	27
More funding for affordable housing is needed	21
Not enough affordable rental housing/DOH should encourage affordable rental housing development	21
Not enough affordable owner occupied housing/DOH should fund programs that assist homeowners or those purchasing a home	16
Community opposes affordable housing/Education of community is needed	16
Landlords are unwilling to rent to those with barriers such as eviction records, criminal records, or low incomes	13
Affordable and accessible housing for people with disabilities is needed/DOH should fund accessibility modifications	13
Rental housing is too expensive or not available in tight markets	9
Land zoned for affordable or multi-family housing, or with sewer/water on site is needed	7
Case management or supportive services are needed to stabilize households	6
Utility costs are high in units/Energy efficiency programs are needed	6
High cost of land is a barrier to the development of affordable housing	6
Funding restrictions and regulations are a barrier to affordable housing	5
High taxes make housing unaffordable	5
Lack of regional communication and cooperation hinders efforts	4
Regionalization of CDBG housing funds poses barriers to local communities	4
More technical assistance is needed for housing providers	3
Affordable housing is not affordable to extremely low income households	3

Total Respondents: 305

Homeless Service Needs and Priorities



**According to the U.S. Interagency Council on Homelessness, rapid re-housing is the practice of helping families and individuals quickly move out of homelessness and into permanent housing, which is usually in the private market. Services to support rapid re-housing include housing search and landlord negotiation, short-term financial and rental assistance, and the delivery of home-based housing stabilization services, as needed.*

***According to the U.S. Interagency Council on Homelessness, permanent supportive housing is a proven, effective means of reintegrating chronically homeless and other highly vulnerable homeless families and individuals with psychiatric disabilities or chronic health challenges into the community by providing long term housing and providing voluntary ongoing supportive services*

Total Respondents: 379

Homeless Service Needs and Priorities

The following question was answered in a narrative format by respondents. In order to summarize the responses for this report, responses were grouped by category. Categories consist of responses that came up multiple times among respondents. Responses that addressed more than one category were grouped in multiple categories. Responses that did not fit any of the categories were considered by the Division of Housing, but were not included in this summary report.

11. What barriers does your community face in implementing Rapid Re-Housing programs for homeless individuals and families and how can the Division of Housing better utilize limited funds to assist in overcoming this barrier?

Barrier to Rapid Re-housing/How the Division of Housing can Assist Communities	Number of Times Issue was Mentioned by Respondents
Limited affordable units available or Landlords of existing units are unwilling to accept clients with barriers	82
There is not enough funding for Rapid Re-housing/DOH could provide Rapid Re-housing funds	31
Rapid Re-housing programs do not provide enough funding for staff and supportive services/DOH could fund staff time and supportive services	28
Limited employment available/Jobs or job training needed	16
Homelessness is not an issue in community	15
Lack of community support or awareness of homelessness/Education of community is needed	13
HUD's homeless definition is too restrictive and excludes those in need	11
Permanent supportive housing subsidies needed	6
Households need access to an emergency shelter while finding a unit	6
Transitional housing is a better option/DOH should fund transitional housing	5
Community needs more Rapid Re-housing programs	3

Total Respondents: 258

Homeless Service Needs and Priorities

The following question was answered in a narrative format by respondents. In order to summarize the responses for this report, responses were grouped by category. Categories consist of responses that came up multiple times among respondents. Responses that addressed more than one category were grouped in multiple categories. Responses that did not fit any of the categories were considered by the Division of Housing, but were not included in this summary report.

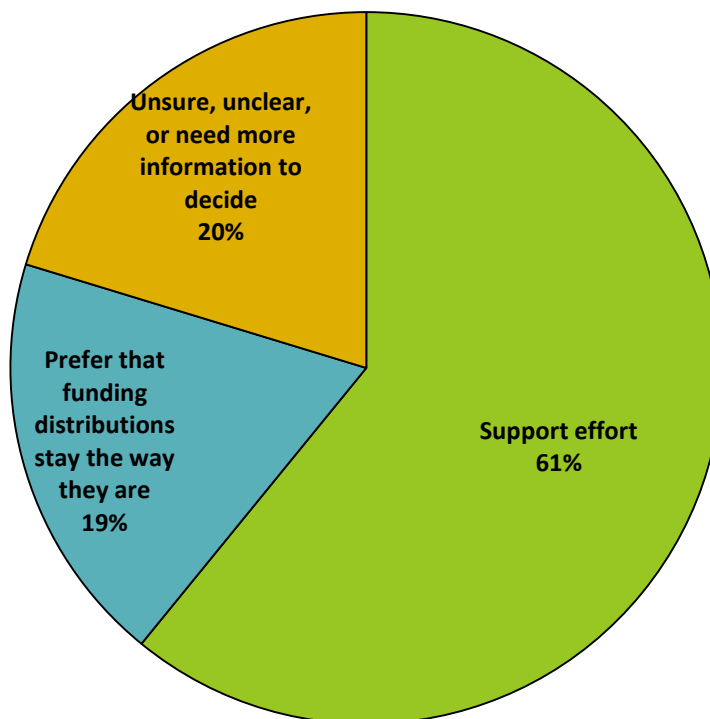
12. What are your most significant local barriers to building and operating Permanent Supportive Housing?

Barrier to building and operating Permanent Supportive Housing	Number of Times Issue was Mentioned by Respondents
More funding for permanent supportive housing is needed	87
Community opposition and misconceptions about homeless population are a barrier	57
Operational funding is needed for staff and supportive services	38
Affordable units are not available or landlords of existing units are unwilling to accept clients with barriers	11
Land is not available or is too expensive	10
No agency in area has the capacity to manage permanent supportive housing	5
HUD's chronic homeless definition is too restrictive and excludes those in need	4
Homelessness is not an issue in community	3

Total Respondents: 251

Homeless Service Needs and Priorities

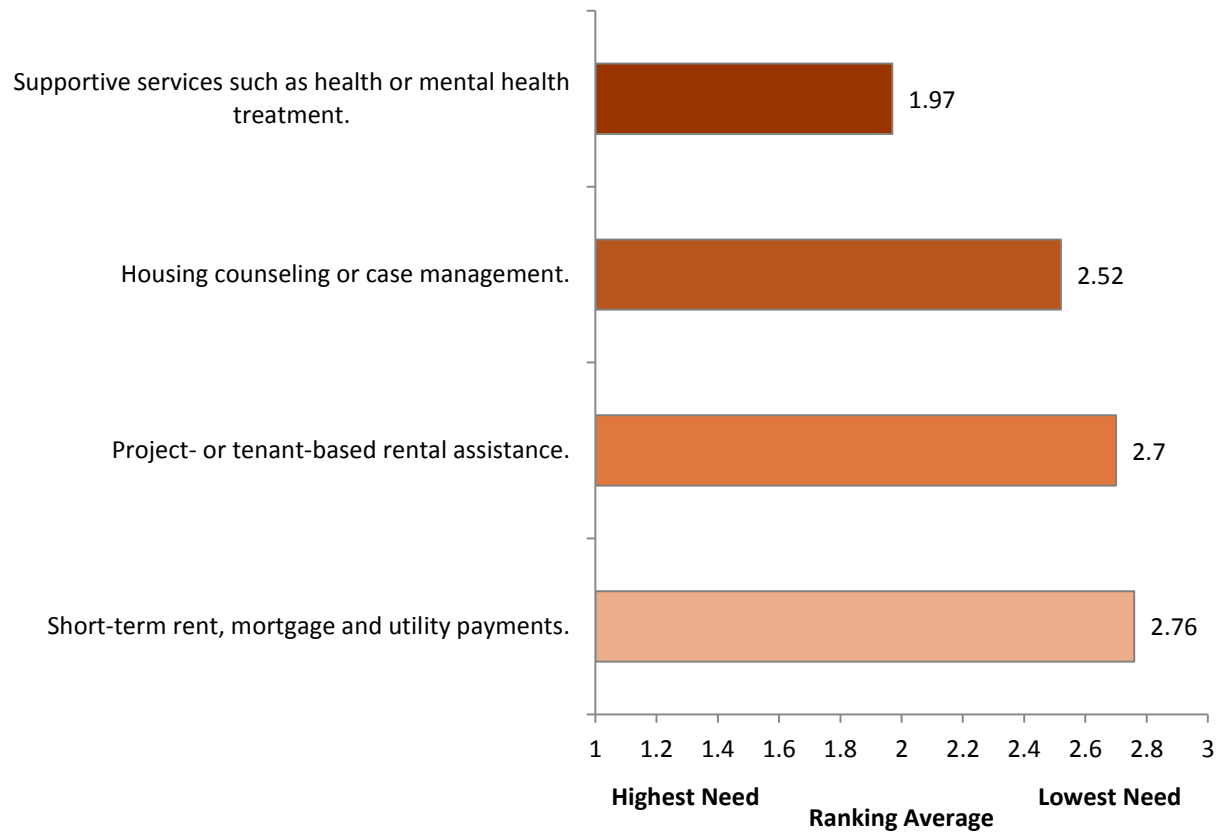
13. Program rules allow the Division of Housing to redistribute a small portion of funding traditionally used for community development and affordable housing programs to provide critical supportive services to house chronically homeless individuals and families in non-entitlement communities. Do you support this effort or would you prefer that funding distributions stay the way they are?



Response Category	Response Total	Response Percent
Support effort	165	61%
Prefer that funding distributions stay the way they are	51	19%
Unsure, unclear, or needs more information to decide	55	20%
Total	271	100%

Homeless Service Needs and Priorities

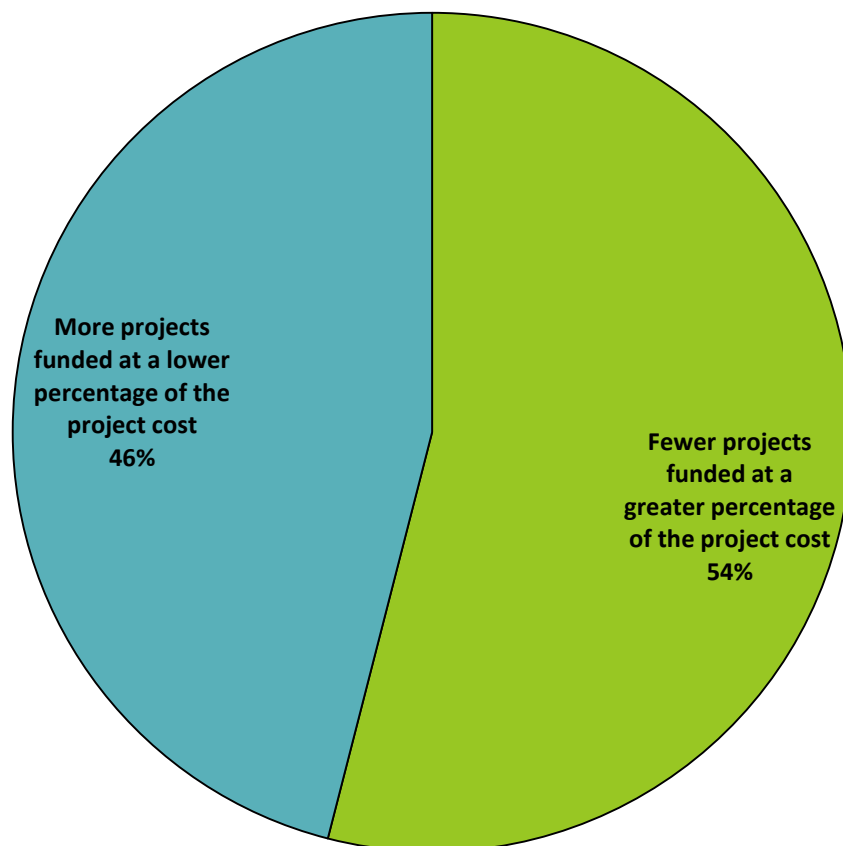
14. Housing Opportunities for Persons With AIDS (HOPWA) provides different types of housing and supportive assistance for persons with HIV/AIDS. Please rank the following priorities from 1-4 based on your community's needs (1 being the highest need).



Total Respondents: 335

General Questions

15. Would you rather see fewer projects funded at a greater percentage of the project cost or more projects funded at a lower percentage of the project cost?



	Response Total	Response Percent
Fewer projects funded at a greater percentage of the project cost	199	54%
More projects funded at a lower percentage of the project cost	170	46%
Total	369	100%

APPENDIX C: SUMMARY OF CITIZEN PARTICIPATION

9.21.14 – Spooner, WI:

CDBG:

- It does not make sense that CDBG is based on income. The limited pool of funds available is not going to the people who actually need it because CDBG does not consider assets.
- The Regional Program is working for Washburn County.
 - o The regionalization of CDBG makes sense because it should cut administrative costs. The only concern is if everyone in the region has a “shot at [the funds]”.
 - o There is a tremendous need for funds in Northern WI due to substandard housing. Any way to keep administrative costs down will help get the funds to those who actually need it.
- Revolving Loan Funds: If they aren’t being moved (if they are idle or unused) they should be dispersed, or used, someplace else.
 - o It is reasonable to redistribute RLFs after 5 years.

HOME program:

- Concern was expressed about the fact that PHAs aren’t allowed to apply for HOME funds without the involvement of a CHODO. This leads to confusion as to how, or who (a PHA or a CHODO), to apply for HOME funds.
- There is a need for an additional 135 public housing units. There is a particularly desperate need for affordable housing/rental units in Indian Head (\$800/month).
 - o Great need for multifamily housing as most of the affordable rental housing is built for senior or disabled persons.
 - o Substandard housing is getting premium rent because of the shortage of good housing on the private market.
- There are issues with local zoning, communities don’t permit multifamily zoning.
- Need more work, or a coalition response, at the community level: education (about the barriers to affordable housing), building relationships with local leaders, drug abuse prevention
- Would like to see funding that could address drug prevention because we need community stakeholders who:
 - o Do a comprehensive needs assessment
 - o Develop a plan
 - o Comprehensive planning on a range of issues
 - o Implementing the plan
 - o Evaluating the process and the output
 - o Challenges: identifying a person who is in charge of coordinating that work – local communities targeting community problems
- Would like to see an emphasis on low income housing rather than rental assistance.
 - o The housing stock is poor quality and lacking, so rental assistance isn’t effective, need more affordable housing.
- Need more help from DOA-DOH when a project gets a lot of resistance

Part 5 Income:

- Agreed that keeping HUD’s definition would be easiest.

ESG:

- There were comments about how it is difficult to help persons who are homeless because the communities can't help these people until they're "literally homeless". There is a lot of trouble with the definition of "literally homeless".
 - o HUD's definition is limiting because these people cannot be helped until they're on the street.
 - o Often, because these persons don't fit the criteria, people get incarcerated again.
 - o If HUD's definition can't be changed, how can serving this population be made better or easier? Should we tell them to sleep outside for a day so we can count them as "literally homeless"?
- Rural homelessness vs. Urban homeless: Homelessness looks different in rural areas of Wisconsin than it does in the urban areas. These individuals couch surf, sleep in garages or porches, they live in places not fit or meant for human habitation. The definition of homelessness is restrictive.
- There aren't always homeless shelters located where people who are homeless are located. There's no way to transport these people to the shelters so they are forced to sleep under bridges.
- There is a need for more facilities to assist homeless persons with a criminal background.

HOPWA:

- Have only worked with one family living with AIDS, don't think there is a high need for this in rural Wisconsin.

Technical Assistance:

- There is a need for more technical assistance. The problem with the existing technical assistance is that the DOA-DOH doesn't provide technical assistance in more diverse geographic areas.

9.22.14 – Crandon, WI:

- The attendees were mainly in attendance to discuss housing.

CDBG:

- Regionalization is working well, would like to see this continue in the future.
 - o The only push back about Regionalization is from the PHAs. The funds they used to rely on is going away, the PHAs are currently seeing dwindling revenue. There is a battle with PHAs over funds.
- The Regions have too much money and don't know how to get rid of it, this region is trying to do more advertising.
- Revolving Loan Funds: These are kind of a headache.
 - o It would be nice if RLFs could roll into the greater region (flowing through the 10 county community).
 - o Housing and Economic Development are two distinctly different things.
 - One year is sufficient to redistribute RLFs for housing
 - Economic Development takes longer, five years is probably a sufficient amount of time to redistribute those funds
- CDBG should be used for services as well.

- There is difficulty rehabilitating persons who have been in jail, so they would get another offense.
- There's need for assistance with mental health issues because adult protective services was cut. They could always use more money to help with mental health.
- This money would not be difficult to allocate amongst the municipalities.
- "Main Street" is dying in many of the towns, its buildings are falling apart and there's no funding available to rehab them. Because of this, the buildings end up going to the county.

HOME Program:

- There is a lack of rental units and those available are substandard.

Part 5 Income:

- Using Part 5 will ensure that there won't be confusion as to whether or not the grantees are in compliance.

ESG:

- The towns above Highway 29 don't have enough funds because the State doesn't come up here enough.
- Hasn't heard of homelessness being a problem, the big problem is drug addiction.

HOPWA:

- This input session is unaware of this as a problem.

Operation Fresh Start Program:

- This is a way of not having to pay contractors, you get able bodies to build new projects. This also helps with job training.

9.25.14 – Stevens Point:

CDBG:

- Displeased with the regional approach/regionalization of CDBG funds.
 - The regionalism has been ineffective, seeing favoritism on behalf of the administrators, would like to go back to a model where counties could compete against each other
 - Not enough money for a big geographical region, the extreme rural areas get ignored
 - Only having one provider for each region is problematic
 - The regional model doesn't allow politicians to get the credit for housing development/economic development, so consequently the politicians aren't as invested ("they don't care as much")
 - Some communities are declining to apply at all because the regional model makes these small communities feel hopeless like they have no voice
- Revolving Loan Funds
 - The communities can't get the money out because of the housing crisis – people are in incredible need.
 - In 18 years, this particular community has only one RLF monitoring visit. The State needs to start monitoring RLF to see what is actually out there (that is being used or not being used).
 - Keep in mind that a lot of the town's clerks work in the evenings as their part-time jobs. They are in need of training because some of this is too overwhelming for these clerks

- Need more TA (technical assistance) for town clerks and others regarding RLFs. Need more access to administrators and experts.
- Spending 15% of CDBG funds on “other services”
 - Attendees said that they would like to see “other services” as having a broad definition: attorney needs, mental health, issues beyond housing
 - One issue is that the applicant has to be a municipality. There is a need to assist the municipalities to show them that there are organizations that can administer these funds.
 - The regionalization model has been very problematic and they foresee this being a problem in the future – or in how any type of CDBG fund is distributed
 - One person did speak up and say that they liked the new CDBG Regions but they were concerned and wanted to see change in how that was administered (“the provider part”). They would like to see the provider pass some sort of test to prove that they have the capacity to administer CDBG funds.

HOME Program:

- There is a need for funds to go towards a weatherization program, there are a lot of issues with homes that fixing up. Much of these homes are owner occupied.
 - Some of these houses are in such bad shape that you can’t do weatherization on them because HOME dollars are limited. This is most commonly a problem of low income persons or elderly families.
 - There’s specific, and pressing, repairs (“necessary issues”) that aren’t being addressed on homes that have been through the program: lead paint, electrical, asbestos
 - These funds aren’t substantial enough to meet the needs of the housing stock, especially not as far as it used to.
 - The houses are in such bad condition that they are a nuisance to the entire neighborhood. The communities are worried about another wave of foreclosures, the banks don’t even want these houses because they’re too much of a burden.

ESG:

- It is difficult to understand HUD’s definition of “literally homeless”
 - Do they need to stay on the street or in a hotel?
 - The definitions get people confused as to how to refer people in crisis – also very hard to explain to your community
 - More education needed for these definitions
 - The communities don’t understand that these are HUD definitions
 - The definition is especially tough for persons in transition: foster care, jail, relocation
 - Need set-asides for a night in a hotel, or something, so that they are allowed to meet the definition of homelessness (15% of CDBG used for “other services” possibly?)
- The State formula for how the funds are allocated are problematic.
 - Some projects suffer because of this allocation formula
 - The allocation formula needs to be described in words people understand
 - Need to reevaluate how these priorities are set
- A group in attendance likes the Rapid Rehousing program, thinks that the State should be supporting that program as much as possible
- TBRA (tenant based rental assistance) are underfunded, not enough providers in the State

- There needs to be more TA (technical assistance), more training, more education, and more funds dedicated to admin

Homelessness and ESG:

- Supportive Services are problematic because the requirements are so difficult and it is hard to make a 15 year budget work
 - Rental Housing Projects using HOME funds: Not going to put social services(perhaps someone on site who is trained in mental health counseling, or job training) needs on the HOME application. It is very hard to find someone qualified, and to pay them for these services
 - Maybe this needs a separate funding source, one that is separate from the construction of the project
 - Difficult to deliver needed supportive services in rural areas
 - The “walk scores” on applications are problematic in rural areas because there isn’t any public transportation. Feels as though the applications punish those that work in rural areas because the need is “spread out and hidden”
 - If we are allowed to change the application (if these things aren’t federally required), it would be logical to make the application more in line with the needs of the State.

Affordable Housing Needs:

- The housing isn’t being built in the proximity of available jobs. There isn’t any available land to build “worker housing”
 - It’s difficult to get people jobs when there aren’t any organized busses to get them to the jobs
- A lot of people are living in substandard housing solely because it’s affordable
 - Cities are cracking down on substandard housing, trying to rehabilitate this housing or get rid of it completely. This may sound odd, but this is actually hurting people who are in need of affordable housing. The only affordable housing is also substandard housing
- There is an aging population, need senior housing that is safe and accessible
 - It is a challenge to get the aging population to move out of their homes – ageing in place isn’t always the best option.

Part 5 Income:

- There is no problem with using Part 5 Income, however there is a need for more TA (technical assistance) or training about what Part 5 Income means

HOPWA:

- There is not enough money to serve the population that needs it

Economic Development:

- It is difficult to get businesses to comply or cooperate with these grants because they don’t necessarily want to only hire LMI workers
- There is a need for job training in many Wisconsin communities
- More collaboration is needed, there is a divide that everyone is upset about
 - The CAP agencies feel as though they’re “not even allowed at the table,” or aren’t a part of the discussion.

9.10.14 – Madison + Online Webinar:

CDBG: What needs are being experiencing in your community

- Dane County: real problem of homelessness and older adults who outlive their retirement savings and they become homeless
- Dane County: transportation issues
- Dane County: single men have difficulty finding transitional housing because so many of the shelters focus on homeless families
- Dane County: Long waiting list for affordable housing which makes individuals at-risk,
 - o Affordable housing for elderly in Dane County is not in fact affordable, this is an increasing problem with both the elderly and teenagers (between 18-21)
- NW region: Problem is homebuyer assistance program, a continued need for homebuyer assistance
 - o Want to see these dollars continue
 - o Rehab projects need to continue throughout Wisconsin so that they can assist the elderly to age in place → need help renovating their homes
- How should we allocate CDBG funds over the next 5 years?
 - o Low Income Housing Facilities are needed, shelters aren't the solution, however building affordable housing is the answer
- Revolving Loan Funds
 - o What is the reason that these funds aren't being used? I think we should know why these funds aren't always being used
- HOME Investment Partnerships
 - o Section 8 voucher program is at a complete stand still, not accepting applications...need a more flexible voucher program that can be used in a regular market rate apartment
 - The individuals that were picked from the Section 8 lottery didn't receive assistance but instead put on the waiting list
 - Winning this lottery just means that they will be screened for Section 8
 - o Family housing is needed, there's a huge need for it! Especially for rental units with more than one bedroom.
- Part 5
 - o Stay with Part 5...universal (or almost universal) nods from the audience in agreement to staying with Part 5 Income
- ESG
 - o Transportation for homeless persons to shelters, to community meals, to case workers. Transporting is needed because people who are homeless still need to get around.
 - Allowing some of these funds to be allowed to concentrate on transportation would be beneficial.
 - o Mental Health Issues → there seems to be no way to deal with this
 - Many are in/intertwined with the criminal justice system
 - There are very few services
 - o Long waiting lists for affordable housing means that someone needs to move multiple times before they find a place to stay. This is very expensive for the person.
 - This is also a problem of a lack of stability, especially for children who suffer because they aren't able to learn.

HOPWA

- No comment

Madison's GoToWebinar Attendee Report:

The online webinar was conducted using GoToWebinar software. GoToWebinar generates reports (Attendee Report, Performance Report, and a Registration Report) after the completion of the webinar. Below is a transcript of the comments generated from the Attendee Report; these comments reflect the public input received via the chat feature on GoToWebinar.

Attendee #1:

Q: Since the housing regions now provide funding for homebuyer down-payment assistance and home rehabilitation from CDBG

funding, perhaps HOME funds should be focused on the development of additional affordable rental housing and tenant based rental assistance.

Q: I have a question about the requirement for grantees to undertake three fair housing actions. I think that's great, but am curious

what type of actions you have in mind and if you will have suggestions for grantees.

Q: Thanks!

Attendee #2:

Q: Rapid Rehousing does not work for individuals with mental illness or other disabilities. An interim option is needed while consumers are being stabilized.

Attendee #3:

Q: Cross use of funds in the Home Program. Opportunity to use Rehab funds for TBRA assistance.

Attendee #4:

Q: Aging infrastructure in communities with limited ability of most communities to fund necessary improvements. (NW Region)

Q: Continued demand for owner-occupied rehabilitation assistance will continue over the next 5 years and beyond.. The ability for LMI

clients to make necessary repairs to their homes continues to be difficult for many. Continuation of funds to Regional Housing

Programs will assist in helping clients based on funds provided.

Q: Moving forward (in 5 years and beyond) the Unit of Government should continue to have the ability to consolidate their CDBG

funds (ED or Housing) into an existing or to be established regional RLF programs across the state..

Q: Similar to the CDBG program comment, housing rehab needs are present in the rural areas of the state. HOME funding can

definitely assist in meeting the housing rehab needs of LMI clients. Additionally, down-payment assistance is needed to assist LMI

households meet financial institution's down payment requirements.

Q: From my experience, the funding allocation method used in the past has been working well and could be applied over the next 5

years.

Q: Part 5 is working well in determining eligibility across CDBG and HOME.

Q: As a follow-up to the question of when should CDBG funds be returned to the state if inactive, I would suggest that if a regional

CDBG ED fund has been established the inactive funds be placed into the regional ED fund and on the CDBG Housing side inactive

RLF monies be placed into the Housing Regions.

Q: Funds to a regional program will ensure the funds stay in a Region versus dispersed elsewhere.

Q: That is one scenario, similar to the NW Regional CDBG fund already in existing here in the NW West

Attendee #5:

Q: I am in Door County and There is definitely a need for Home buyer assistance and home repair. At this point in the year there are

no matching grants available so there is an issue with using the CDBG grants for housing assistance at this point in the year. IS there

any chance of having the matching part taken out of the grant so more people can use the grant this year that don't have

down payments of their own?

A: In door county is this how they've established this program?

Q: Yes

Q: We use it as home buyer assistance and repairs

Q: O.k. thank you

Q: The low income people that get the grants to help with down payment assistance, most of them would not be able to repay funds and

would deter people using the grants.

Attendee #6:

Q: Housing improvements for roofs, windows are needed for homeowners who are currently underwater with their mortgages due to the

recent decline in home values.

Attendee #7:

Q: Hi, I have no audio yet

A: Hi Kathy, we are currently still muted. We will begin very shortly

Q: homelessness-Monroe County

Q: no shelter here

Q: shelters in an area where there are none would be a start

Q: yes

Q: in rural areas it may be harder to spend the money quickly. I feel there should be different guidelines for these areas

Q: communication is the key

Q: rapid-rehousing is a great idea, but when there is no housing to move households into, it stops there

Q: they then try to

Attendee #8:

Q: Difficulty for low income households to save for a down payment; need for additional rental housing development.

Q: Securing long-term attainable workforce housing.

Q: Correct.

Q: Our regional CDBG program is a matching fund. Buyer must provide at least \$1000 that can then be matched by CDBG.

Q: Sam Perlman - representing Door County and the NEW Regional Housing Partnership.

Q: Provide the greatest amount of flexibility as possible.

Q: I say keep it. Other fund sources, like Federal Homeloan Bank, use the same definition.

Attendee #9:

Q: In Waukesha County (specifically in the city) we are experiencing a lack of funds, specifically in RRH.

Q: There is not enough money to go around and make a true impact, and solve homelessness.

Q: Lack of affordable housing that is willing to except people with barriers, even long ago eviction records and minor criminal history.

Attendee #10:

Q: I have a meeting at 11:00 but just wanted to say thanks for your support and I encourage you to keep funding rapid rehousing

programs and case management services. Thanks.

Attendee #11:

Q: rental assistance for PSH to assist chronically homeless

Q: Utilized RLF prior to spending out any 'new' money

Q: thank you!! Go-to worked very well

Attendee #12:

Q: Five years seems reasonable, small towns might have a tough time to use funds in a shorter time. As long as activity, then I would

think it was active

Attendee #13:

Q: Agreed - investment in rural areas in affordable housing is imperative.

Q: communication on a broader spectrum - who is getting the money, why isn't it being used, how long has it been sitting out there. An

online list? accessible to the communities.

Q: #1 - Increased TBRA funds targeting those eligible areas that demonstrate the need and ability to manage the funds; preference to

those programs/agencies willing to serve individuals and families with the significant service needs and are not eligible or are unable to

secure assistance through the HUD homeless assistance funds.

Q: ESG - emphasis on rapid re-housing and less on prevention. Continued combination of the HPP and ESG in one grant.

9.12.14 – Platteville, WI:

CDBG:

- Homelessness is a big problem in Grant County – however there isn't a shelter because of flooding and there are very few resources to help homeless people in Grant County.
- There is a need for wrap around services, but also for financial literacy and domestic abuse
 - o Domestic abuse and substance abuse are big problems in the community in addition to a lack of housing. There are few resources to help people get back on their feet.
- Housing costs are a big problem, likely because of the college. Therefore, affordable housing is extremely difficult to find particularly when school is in session.
 - o We can help with security deposit and first month's rent but the housing isn't there. We also need life skills programs; people don't know how to keep jobs even when we can get one.
- Transportation is an issue
 - o There is only one substance abuse counselor, difficult to get those in need to the counselor
- As jobs pay minimum wage, people are almost better staying on public aid, as they tend to lose benefits trying to get back on their feet.
- There is a skills gap that limits people from getting higher paying jobs. Job training is a needed service for this community.
- Economic Development and Public Facilities
 - o There is a transportation issue. We have people walking on the highways because of the Walmart business expansion. It needs to be safer for them to get to work. Sidewalks? There's no public transportation – just two small cab companies that have limited hours.

There is also a shuttle that only runs during the school year that many in the public may not know about. It only costs a dollar but once again people do not know about it.

Would cab vouchers be covered under the public facilities?

- Regionalization of CDBG
 - o Many of the attendees were from non-profits. They didn't understand the regionalization of CDBG and think that this should be better explained ("advertised").
 - o They were also concerned that the regions weren't fairly distributing their funds – that the funds were unfairly going to entitlement communities
 - As there was so much concern about "hoarding" funds, it was suggested that a third party should be involved to make sure that the funds are fairly and evenly distributed.
 - There was also expressed concern about transparency of the grant distribution. They would like to see where the money is going and who it is serving.

Revolving Loan Funds:

- Non-profits requested a list of communities that have available funds.
- There was no conclusive decision about when RLFs should be returned. The attendees thought that this should be more of a case-by-case basis.

HOME Investment Partnerships:

- There is little LMI housing because the cost of living is too high. Full time wages are not enough to afford rent, especially when a family has children.
- There is no affordable family housing, the cheapest rent is \$450

Part 5 Income:

- It was suggested that Part 5 Income should be changed to Net Income instead of Gross Income. It's a huge difference. People can be turned away because of their gross income.

ESG:

- More funding is needed as the communities run out of money very quickly. There is not a lot available throughout the State.

HOPWA:

- There is little discussion of HIV/AIDS in rural Wisconsin, it's unknown in the rural areas. There are likely people living with HIV/AIDS but no one would talk about it, as they would in the cities/entitlements. It would be a discussion solely between a patient and a doctor.

APPENDIX D: PUBLIC COMMENTS AND DIVISION OF HOUSING RESPONSES

Wisconsin 2015-2019 Consolidated Plan Public Comments

1. Received on 1/14/2015

Using the regional CDBG Program does not work for us. The response time is too slow when a business needs assistance. By managing the RLFs locally, we are able to form a working relationship with the businesses. We are also able to form partnerships with the local banks to benefit our business clients.

I don't believe RLF funds should be taken at any time. The money in the RLF accounts for our county were earned by working with the local businesses so they were in a position to pay back the money with the understanding that the money would be available to local businesses in the future. When the regional economy is weak, we obviously don't lend out as much from our RLF account, but the money should be available when the economy picks up again.

Ashland Area Development Corporation

2. Received 1/21/5015

Disproportionality should not be broken out by race, but broken out by census tract. Focusing on census tract will help the DOA target areas that need the greatest amount of grants. Affirmative action doesn't work as it has only promoted more segregation. Treat it all as one population of the "human" race and focus on their location that is how we improve our communities. - In Elroy, we are about 98% white, and 2% all other races; however, Elroy is a low to moderate income community and has housing and severe housing problems that need to be addressed. If the DOA will be basing its future decisions on the disproportionate section of this document, Elroy will see no dollars because we are white, yet I would argue this is a very depressed part of the state that needs work. I worked in Rusk County, and that is one of the poorest counties in the state and is also 90some% white and they are in a need for assistance in housing repairs. If the DOA focuses on census tract then dollars can be channeled to the most depressed areas of the state/counties and we can jointly affect people's lives positively rather than pitting race against race.

That is all I have for now. I will continue to review the document and make comments. Thank you for your time.

City of Elroy

3. Received on 1/27/2015

Good day,

I would like to make some comments and I have some questions on the Consolidated Plan.

1. On page 22, it states "Describe the number and type of single person households in need of housing assistance". The response is that there is no estimate for this population. I am curious to know why and this is a large portion of our homeless population.
2. On page 22, it states "Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.". The response is that there is no estimate for this population. I am curious to know why.
3. On page 55, in the paragraph "For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction." I think it would be prudent to note that there are some counties and areas that do not have the option of a shelter facility. In some areas, shelters are hours away and with the transportation issues that people in poverty have, they are not even accessible.
4. In the table on page 70, there is a category for Mobile Home, boat, RV, van, etc. I can see a mobile home as a residential property, but not the others...why were those included. The others are places not meant for human habitation.
5. On page 82 there is no data for children present. Will there be? I am very curious about that number.
6. On page 91 in the Transitional Housing Program paragraph, I believe it would be important to include that this program is for a very unique population and is necessary to keep in the portfolio of services offered. HUD is attempting to replace this program with Rapid Rehousing but the Transitional Program offers supportive services that give households better odds at beating their circumstance. These services are vital to their long-term success in housing.

Thank you for your time!

Community Action Coalition for South Central Wisconsin, Inc. (CAC)

4. Received on 1/ 30/2015

Comment on Consolidated Plan:

The map of BOS local CoCs is labeled incorrectly. The area named West CAP should say West Central, the area called Couleecap should say Coulee, and the area named Western Dairyland should say Dairyland. This also applies to all the tables.

Thank you,

West CAP

5. Received on 2/4/2015

I would like to make the following comment regarding the Wisconsin Division of Housing's 2015-2019 Consolidated Plan.

Community Development Block Grant (CDBG) Revolving Loan Funds (RLFs) should include a specific plan for spend down. As municipalities recapture funds, there should be a specific time period in which the funds need to be committed and spent (suggested 24 months total). This should apply to RLFs in which there are over \$10,000 in funds available. If identified projects are over \$10,000, they should partner with their local CDBG Housing Regions. Municipalities who fail to spend their funds in a timely manner should have the funding removed and placed in their CDBG Housing Region's RLF account.

Additionally, municipalities should be granted greater freedom to spend their RLF funds on different project activities as long as they are allowable under CDBG. For example, if a municipality used their original CDBG allocation to provide owner-occupied rehabilitation and homebuyer assistance, their recapture funding should not be limited to these activities only. Rental rehabilitation should also be an avenue for spending down the funds. The current process for allowing exceptions is tedious and difficult for municipalities to navigate.

Couleecap, Inc.

6. Received on 2/5/2015

February 4, 2015

Re: DRAFT 2015-2019 Wisconsin Consolidated Plan

Dear Ms. Marks;

Options for Independent Living is a non-profit, non-residential community based organization assisting people with all disabilities and those who are older in 17 Counties of Northeast Wisconsin and the Fox Valley. We would like to submit the following comments to the 2015 Wisconsin Consolidated Plan.

The need for affordable accessible housing for this population is great! People with disabilities and those who are older continue to face enormous obstacles when trying to find affordable accessible housing, whether in the private or public sector. Therefore those living in inaccessible apartments continue to be denied the ability to live to their full potential. Finding housing with level entries, wider doorways and halls, and larger bathrooms with walk-in or barrier free showers are scarce. And those that do have the aforementioned amenities have renters who stay there for years due to the accessibility. This should prove that not only when you build them they will come, it also shows they will stay!

We are requesting that the DOA/DOH will make funding available specifically for rehabbing existing public units for accessibility in urban and rural areas. In addition, we ask that any funding for new construction, in urban and rural areas, is released with the caveat contractors go above and beyond the number of units mandated for accessibility and construct a minimum 50% of the units accessible in regards to wider doorways, hallways, and walk-in showers (without molded seat or glass doors). This will allow more people, not just those with disabilities, to age in place eliminating the need to move when their accessibility needs increase, thus saving money for the consumer and landlord. The other 50% remaining units should be constructed using **universal design principles**, thus allowing everyone in the building to be able to visit each other.

The other program that is having an impact on peoples' lives as it relates to housing is the HOME Program. *Options* has had a grant to administer the HOME Program for over 12 years. Our service is specific to modifications for accessibility and of course HQS. There are so many people who experience a traumatic disability and are of limited income that need changes to their home for accessibility. Or, as part of the aging process, their accessibility needs increase. For many of our consumers, making the accessibility modifications is the difference between remaining in their homes or going to an institution such as a nursing home. The deferred mortgage at zero percent interest is working very well for the individuals we serve. We would encourage the Division of Housing to 1) maintain the HOME Program funding at the current level and 2) encourage all grantees to do any projects with major renovation involved to incorporate at a **minimum principles of viability** or **preferably with universal design**. This

will increase the availability of housing stock with at least some levels of accessibility for Wisconsin's population.

If we start now, the future housing stock for people with disabilities will be brighter. But it must start now!

Thank you for your time and consideration of these comments.

Options for Independent Living

7. Received on 2/5/2015

February 5, 2015

Ms. Lisa Marks, Administrator
Division of Housing, State of Wisconsin
101 E. Wilson Street, 5th Floor
PO Box #7970
Madison, Wisconsin 53707

Dear Lisa:

On behalf of our Board of Directors and member agencies, please accept the following as comments from the Wisconsin Community Action Program Association (WISCAP) on the HUD Comprehensive Plan for 2015-19:

In general, our review of the Consolidated Plan found no mention of “farm workers, agriculture workers or Spanish speaking” populations. This omission can seriously weaken the ability to develop more farm worker housing in Wisconsin. In addition, without farm workers or agriculture workers being specifically mentioned in the Plan, the chance of accessing HUD social services money for these populations and to the benefit of the state are reduced.

We also have the following observations and comments relating to specific portions of the Plan:

Page 1: The report acknowledges the Plan’s central focus to meet the needs of low and moderate income persons. This is important and consistent with the legislative intent for CDBG and HOME programs.

Page 2 and page 116: The first two of the Division of Housing’s 12 goals listed are (1) rehabilitate owner occupied housing and (2) rehabilitate rental housing. Rehabilitating housing is an excellent way to meet the needs of low to moderate income persons. According to a National Association of Home Builders (NAHB) report published in 2009, spending on rehabilitating housing has strong ripple effects on local economies. Rehab creates improved living conditions for low to moderate income residents and long term improvements in local property tax bases. In addition, typical rehab projects employ construction workers who are generally moderate income. Construction workers have experienced high unemployment since the economic downturn of 2008 and are thus especially in need of support. “The estimated one-year local impacts of \$10 million spent on remodeling in a typical metro area include \$6.9 million in local income, \$577,000 in taxes and other revenue for local governments, and 78 local jobs. “ (NAHB 2009)

Page 68: Housing Market Analysis: Common themes include an aging housing stock and the prevalence of single family homes. Much of the existing affordable housing stock is in poor condition and in need of rehabilitation. Also, lead paint hazards are especially prevalent in older homes and these too require investment in lead safe rehab both for owner occupied and rental dwellings.

Page 79: Priority rankings from the Division of Housing public survey ranked the top three priorities as (1) build affordable rental housing, (2) rehab affordable rental housing and (3) rehab affordable owner occupied housing. To address these priorities, the Division's funding priorities should be similar.

Page 82: Risk of lead based paint: the table omits estimates for the number of dwellings occupied by families with young children. To fill these data gaps, consider that Jacobs et al, (prevalence of lead based paint hazards in U.S. housing, 2002) found that 17% of U.S. housing units are occupied by families with children under age six.

Page 83: Note that 220,000 Wisconsin families live in housing with lead based paint hazards.

Page 110: Note that regions with lowest graduation rates also have lowest per capita income. Since lead exposure increases the probability that children will fail to graduate, supporting rehab that prevents lead poisoning also reduces poverty and increases high value employment opportunities.

Page 128: Goal summary information: The table shows that the largest dollar commitment for CDBG funds for the five year 2015-2019 period is \$99 million for economic development, while rehab of owner occupied housing is scheduled to receive \$54 million and rehab of rental housing is scheduled to receive 6.7 million. Unfortunately, the track record for Wisconsin's economic development projects demonstrate only tangential data to benefit low and moderate income families, while the evidence that rehabilitating housing occupied by low to moderate income families benefits low to moderate income families is clear and well documented. It would be more appropriate if Wisconsin made rehab programs the highest funding priority for two reasons: (1) Wisconsin has acknowledged housing rehab as an area of great need and (2) Wisconsin's housing rehab programs are well managed to immediately and clearly benefit low to moderate income families. It is particularly important to make more resources available so owners of rental housing can finance rehabilitating their dwellings. This is because many low income families cannot afford to purchase their own homes and they face limited housing options in the rental markets and far too few dwellings that are both safe and affordable. As a consequence, Wisconsin continues to show rates of childhood lead exposure that exceed national rates. This burden from childhood lead exposures continues to threaten our long term productivity and to impose unnecessary costs on our publically funded educational and correctional systems.

Page 137: Unfortunately, Community Development programs to assist businesses, when compared to housing programs, are not as efficient in terms of clearly benefitting low to moderate income families.

Page 142: Of the 507 jobs estimated to be created or retained by the \$17.7 million/year to be spent on economic development, how many will benefit low to moderate income persons? How many of these jobs will provide wages and benefits that allow workers to obtain affordable health care?

Page 150: Economic development activities “must result in job opportunities for low to moderate income individuals”. How will Wisconsin assure that this goal is met? What system protections or repayment plans are in place to protect Wisconsin taxpayers if businesses should not be able to meet their projections for jobs for low to moderate income individuals?

Page 168: The Plan states that Wisconsin will seek resources at the state and local level to address lead hazards. Why not commit Wisconsin to seek federal resources to address lead hazards? Typically US Department of HUD offers over \$100 million per year through competitive grants to support lead hazard control, lead hazard reduction demonstration and healthy homes programs.

Page 170: the Division of Housing staff has participated in the DHS lead poisoning prevention committees for years and staff has been a crucial partner allowing Wisconsin to make progress in protecting our children from lead paint hazards. Please continue this important and valuable commitment.

Page 176: A plan is described whereby local units of government could partner with local non-profits to use federal funds as loans to finance programs to benefit low to moderate income persons. Then, when the beneficiary repays the loans to the non-profit organization, the funds lose their federal status and no longer must meet federal program requirements. What reporting or monitoring systems will Wisconsin adopt to assure that these recycled funds continue to benefit low and moderate income persons? If the loans were repaid to non-profits such weatherization and Community Action Agencies that are required by charter to address the needs of low income persons, this could be a viable way to protect the value and assure the continued public benefit of these recycled funds.

Thank you and the Division for your dedicated work on this document and thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions or wish further information.

WISCAP

8. Received on 2/2/2015

Division of Housing
Department of Administration
PO Box 7970
Madison, WI 53707-7970

To Whom It May Concern:

The Council on Physical Disabilities has the following comments on the 2015-2019 Consolidated Plan.

Under crowding information on page 22; Title: What are the most common housing problems?

CPD believes that the income levels are addressed but not the fact that a disproportionate number of persons with disabilities fall into these categories. A letter from the Wisconsin Independent Living Network (WILN) provides additional support related to the disproportionate number of persons with disabilities falling into this category stating: "from the HUD 2009 Worst-Case Housing Needs of People with Disabilities Report, renter households that include nonelderly people with disabilities are more likely than those that do not include people with disabilities to have very low incomes, experience worst case needs, pay more than one half of their income for rent and have other housing problems....people with disabilities are disproportionately impacted by other barriers such as the lack of accessibility". The lack of accessible housing units is also supported by information provided in Table 26 of the Consolidated Plan... "At least 85% of Wisconsin residential properties are inaccessible. Even multifamily housing units were not built within minimum accessibility standards of the Fair Housing Act until after March 1991. Given the age of Wisconsin housing stock, the vast majority of Wisconsin housing units, including multifamily units, are not accessible for people with disabilities. This represents a significant barrier for any household with a member with a physical or mobility disability."

The Council on Physical Disabilities believes that the Consolidated Plan should reflect the Olmstead versus LC decision of 1999 in which the Supreme Court of the United States stated that people with disabilities have the right to live in the community with community-based supports and that the government is expected to ensure the integration of people with disabilities.

On page 60 CPD has the following comment under "Describe the characteristics of special needs populations in your community"

Elders, frail elders and People with Disabilities

The Consolidated Plan has a good description of the population however CPD believes that this section may be strengthened by adding a statement that would include the need of those with physical disabilities for accessible housing. For example, an average of 6% of the population age 18 to 65 and 65+ require the use of special equipment for mobility (wheelchairs, walkers) according to an averaging of the data from the Behavioral Risk Surveillance Survey administered by DHS.

On page 62 under the header Persons with Disabilities:

CPD is identified as recommending “visitability” as an opportunity to provide people with physical disabilities the opportunity to visit friends and neighbors in single-family homes. CPD further recommends that the Consolidated Plan include in this section a definition of “Visitability” to ensure that homeowners, builders, contractors, and others have the opportunity to advocate for and develop single-family homes that are accessible to people who depend on wheelchairs, scooters and other assistive mobility devices to visit their family and friends. In addition, incorporating the concept of “universal design” would also help address the accessibility needs of people with disabilities and enhance the ability of individuals with physical disabilities to use many additional products and the built environment.

UNIVERSAL DESIGN

There is a great deal of overlap between what is required under the ADA and what would be suggested by Universal Design, but there are also differences. The ADA outlines the bare minimum necessary in order to curb discrimination against people with disabilities, while Universal Design strives to meet the best practices for design, which are always evolving and improving as we continue to learn more about how to best meet people's different needs. The ADA focuses solely on the civil rights of people with disabilities, while Universal Design is designed with everyone in mind. The ADA does not apply to single family residences, while Universal Design can and should.

Everyone, even the most able-bodied person, passes through childhood, periods of temporary illness, injury and old age. By designing for this human diversity, things can be created that will be easier for all people to use. Universal Design makes things *safer, easier* and *more convenient* for everyone. Universal Design involves designing products and spaces so that they can be used by the widest range of people possible. Universal Design evolved from Accessible Design, a design process that addresses the needs of people with disabilities. Universal Design goes further by recognizing that there is a wide spectrum of human abilities.

Universal Design takes into account the full range of human diversity, including physical, perceptual and cognitive abilities, as well as different body sizes and shapes. By designing for this diversity, things can be created that are more functional and more user-friendly for everyone. For instance, curb cuts at sidewalks were initially designed for people who use wheelchairs, but they are now also used by pedestrians with strollers or rolling luggage. Curb cuts have added functionality to sidewalks that we can all benefit from.

Universal Design can apply to anything that can be designed, including products like door handles, kitchen utensils and smartphones. Universal Design can be applied to architecture and the built environment, including public and commercial buildings, as well as residential buildings and family homes. Universal design can also help older adults concerned with Aging in Place by designing products and spaces that are safer and easier for them to use. Universal design can also be applied to the community at large through urban planning and public transportation.

CPD recommends including the following definitions of visitable/visitability and universal design into the consolidated plan as references:

Defining Visitable/Visitability:

Members of the Housing for All Advisory Committee have come to a consensus in Wisconsin on the following the following draft language:

Any person may advertise a residence for sale or rent as a “Visitable” residence if the residence contains the following features, at a minimum:

- (1) One no-step entrance to the main floor, opening to a sidewalk or other firm surface; and
- (2) 36” wide doors on the main floor (with 18’ clear space for doors opening out and 12” clear space for doors opening in), with lever door handles, 42” wide hallways, and with no-step access to living and dining areas; and
- (3) A main floor half-bathroom (toilet and sink) containing the following features:
 - a. reinforced walls near toilet for grab bar installation;
 - b. lever handle water controls for sink;
 - c. a wall mounted wash basin (undercut lavatory) with under-basin clearance, or an under-basin cabinet with retractable (fold away) doors;
 - d. Unobstructed turning radius of 5’ by 5’.

Defining Universal Design:

The term Universal Design was coined by Ronald L Mace, founder and former program director of The Center for Universal Design at North Carolina State University. In 1997 Ronald Mace collaborated with a group of architects, product designers, engineers and environmental designers to develop the Seven Principles of Universal Design.

The seven principles of Universal Design are as follows:

- **Equitable Use:** The design is useful and marketable to people with diverse abilities.
- **Flexibility in Use:** The design accommodates a wide range of individual preferences and abilities.
- **Simple and Intuitive Use:** Use of the design is easy to understand, regardless of the user's experience, knowledge, language skills, or current concentration level.
- **Perceptible Information:** The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.
- **Tolerance for Error:** The design minimizes hazards and the adverse consequences of accidental or unintended actions.
- **Low Physical Effort:** The design can be used efficiently and comfortably with minimum fatigue.
- **Size and Space for Approach and Use:** Appropriate size and space is provided for approach, reach, manipulation, and use regardless of user's body size, posture, or mobility

Source:

http://www.universaldesign.com/index.php?option=com_content&view=article&id=1761:the-seven-principles-of-universal-design&catid=2196:universal-design&Itemid=2931

Page 73: describe the need for specific types of housing.

Discussion: The State Plan developed by the Council on Physical Disabilities has identified the need for both affordable and accessible housing for people with physical disabilities and has identified the goal of providing affordable and accessible housing as one of its four priorities.

Therefore, CPD recommends that the definition of Rehabilitate in priority two and priority three include at a minimum a requirement to ensure that the units are brought up to the standard reflected in the definition of visitable/visitability.

Further, that funding in priority 4, being provided to build new affordable owner occupied housing require that the architects/builders/contractor/subcontractors be at a minimum required to use visitable/visitability standards when constructing those new owner occupied homes.

Page 95 under the header: “Describe programs for ensuring that persons returning from institutions receive appropriate supportive housing”

Comment: CPD supports the need for Wisconsin’s long-term care waiver programs to include the appropriate benefit and definitions that will adequately support funding for accommodations and housing modifications and assistive technologies necessary to meet the accessibility needs of those returning to the community from nursing homes or other institutional settings.

Page 97: Elders, Frail elders, Persons with disabilities ...

Add “accessibility” definition to HOME.

Comment: Accessibility can mean different things to different people. The Council on Physical Disabilities would also like to stress the importance of having a process to help individuals identify their accessibility needs. Someone may need a ceiling lift to make the bedroom accessible or to use the bathroom appropriately for bathing and toileting. Others may need the building code requirement for a 5’ x 5’ turning space in the bathroom and a roll-in shower.

As part of the making affordable and accessible housing available for individuals with disabilities and the elderly the CPD recommends that resources , such as the Aging and Disability Resource Centers, Board on Aging and Long-Term Care, Independent Living Centers be identified through links to their website to help an individual identify and determine their eligibility for financial resources, programs and services that can meet their needs, assess their housing needs, identify the accommodations that they will require and help to identify resources that may be available to help with the rehabilitation or purchase of assistive technologies or accommodations to help the individual achieve their need for accessible housing.

On page 104 in the table entitled: Civilian Labor Force, the consolidated plan does not account for the unemployment of persons with disabilities.

The quarterly unemployment rate was 11.1 percent for people with disabilities compared to 5.2 percent for workers without disabilities for the fourth quarter of 2014, according to non-seasonally adjusted data from the U.S. Bureau of Labor Statistics (BLS). Source: <http://www.allsup.com/Unemployment-and-Applications-Drop>

CPD recommends that the plan incorporate into this table the current unemployment rate for people with disabilities by target group if possible using information provided by the Department of Workforce Development or US Bureau of Labor Statistics. CPD further recommends that the plan also include information from the Department of Health Services that indicates the current level of employment by target group of individuals receiving long-term support services through the home and community-based waivers.

In the Strategic Plan Overview on page 115

CPD recommends that the definition of low income households be amended to include examples of this target group e.g. persons with physical disabilities to ensure that they are identified as a target group under the 5 high priority needs and under the 12 identified goals due to their unique housing needs in the area of accessibility.

On page 118 SPC 25 Priority Needs-Priority Needs 1: Affordable Housing and Priority Need 2: Homelessness:

CPD recommends that given the previous identification of the needs of people with physical disabilities for affordable housing and the lack of affordable housing the recommendation for high priority needs Affordable Housing should identify and include people with physical disabilities in the target group. In addition, the high priority needs Homelessness should also identify and include people with physical disabilities as a target group.

Page 119 Further an associated goal should be added: To maintain persons with physical disabilities in the community (and out of nursing facilities). Furthermore in the area of Special Needs Assistance, Associated goals add Accessible Housing. Under Priority need 5 Economic Development populations add persons with disabilities.

Under Annual Goals and Objectives on page 141: Under Goal Summary Information... CPD would suggest adding perhaps asterisks by goals 1, 2, and 3 to make it clear that the rehabilitation and building of new housing includes accessibility. Accessibility would be minimally defined as meeting the visitable/visitability standards.

Page 152, HOME Rental housing program: CPD recommends including the definition of Universal Design, as well including the definition of visitability standards/principals. The spelling of **visitability** should be "Visitability " and not Visitibility as it is written in some places in the report.

Page 157 Disaster Recovery Needs

In 2008, Wisconsin experienced severe storms, tornadoes, and flooding. In response to these events, Congress appropriated CDBG Disaster Recovery Funds to affected states. These funds have been used in Wisconsin to meet priority housing, business, and infrastructure needs caused by the disasters. The Division of Housing estimates that 20 housing units and 14 public facility/infrastructure projects are still in need of CDBG-DR assistance. Extensive information about disaster recovery needs can be found in the

CDBG-DR Action Plans on the Department of Administration Division of Housing website at the following link: <http://www.doa.state.wi.us/Divisions/Housing/CDBG-EAP>

CPD has identified the following:

- 1) Rehabilitation is not defined in this link. Funds directed to all rehabilitation should be consistent with “visitability” standards ... i.e. what we discussed from page 62
- 2) Make sure rehabilitation costs include funds for “accessibility” ... i.e. what we’re including on page 62

The Council on Physical Disabilities recommends that the definition of Rehabilitation in the section on Disaster Recovery Needs include the same definitions or use of standards and indicators for visitability, accessibility and Universal Design that CPD previously recommended on page 62. It is important to recognize that not everybody’s definition of rehabilitation will recognize the needs for accessibility features to be either added or repaired and finally not everyone’s definition of accessibility will be the same so using the concept of universal design will allow the needs of everyone to be met.

The Council on Physical Disabilities wishes to thank you for the opportunity to provide comment on the 2015-2019 Consolidated Plan.

Respectfully,

Council on Physical Disabilities

9. Received on 2/5/2015

State of Wisconsin, Department of Administration, Division of Housing, 2015-2019 Consolidated Plan Draft

General Comments

The report acknowledges on page 1 the plan's central focus to meet the needs of low and moderate income persons. This is important and consistent with the legislative intent for CDBG and HOME programs. The report demonstrates in many ways that low to moderate income families in general and especially renters have difficulty finding decent and affordable housing. The report states (page 79) that building rental housing and rehabilitating rental and owner occupied housing will serve to meet the Wisconsin's needs. Unfortunately the spending priorities listed on page 128 do not reflect these priorities. The largest share of funds is devoted to "economic development" rather than housing rehab although it is unclear how these plans will be carried out and to what extent they will benefit low to moderate income families. In contrast, it is very clear how housing rehabilitation programs benefit low to moderate income families, since occupant's income eligibility is determined before the housing is rehabilitated. In addition, the construction workers who carry out this work and receive payment are typically moderate income. The "rehab" construction funds also stimulate Wisconsin's own industrial base that makes replacement windows and doors. Finally, these rehab funds raise property values and create value for local municipalities. For more detail see specific page by page comments below.

Specific page by page comments

Page 2 and page 116: The first two of the Division of Housing's 12 goals listed are (1) rehabilitate owner occupied housing and (2) rehabilitate rental housing. Rehabilitating housing is an excellent way to meet the needs of low to moderate income persons. According to a National Association of Home Builders (NAHB) report published in 2009, spending on rehabilitating housing has strong ripple effects on local economies. Rehab creates improved living conditions for low to moderate income residents and long term improvements in local property tax bases. In addition, typical rehab projects employ construction workers who are generally moderate income. Construction workers have experienced high unemployment since the economic downturn of 2008 and are thus especially in need of support. "The estimated one-year local impacts of \$10 million spent on remodeling in a typical metro area include \$6.9 million in local income, \$577,000 in taxes and other revenue for local governments, and 78 local jobs. " (NAHB 2009)

Page 68: Housing Market Analysis: Common themes include an aging housing stock and the prevalence of single family homes. Much of the existing affordable housing stock is in poor condition and in need of rehabilitation. Also, lead paint hazards are especially prevalent in older homes and these too require investment in lead safe rehab both for owner occupied and rental dwellings.

Page 79: Priority rankings from the Division of Housing public survey ranked the top three priorities as (1) build affordable rental housing, (2) rehab affordable rental housing and (3) rehab affordable owner occupied housing. To address these priorities, the Division's funding priorities should be similar.

Page 82: Risk of Lead Based Paint: the table omits estimates for the number of dwellings occupied by families with young children. To fill these data gaps, consider that Jacobs et al, (prevalence of lead based paint hazards in U.S. housing, 2002) found that 17% of U.S. housing units are occupied by families with children under age six.

Lead-Based Paint

Page 83: Note that 440,000 Wisconsin families live in housing with lead based paint hazards.

Page 110: Note that regions with lowest graduation rates also have lowest per capita income. Since lead exposure increases the probability that children will fail to graduate, supporting rehab that prevents lead poisoning also reduces poverty and increases graduation rates leading to higher value employment opportunities.

Page 128: Goal summary information: The table shows that the largest dollar commitment for CDBG funds for the five year 2015-2019 period is \$99 million for economic development, while rehab of owner occupied housing is scheduled to receive \$54 million and rehab of rental housing is scheduled to receive 6.7 million. Unfortunately, the track record for Wisconsin's economic development projects demonstrate only tangential data to benefit low and moderate income families, while the evidence that rehabilitating housing occupied by low to moderate income families benefits low to moderate income families is clear and well documented. It would be more appropriate if Wisconsin made rehab programs the highest funding priority for two reasons: (1) Wisconsin has acknowledged housing rehab as an area of great need and (2) Wisconsin's housing rehab programs are well managed to immediately and clearly benefit low to moderate income families. It is particularly important to make more resources available so owners of rental housing can finance rehabilitating their dwellings. This is because many low income families cannot afford to purchase their own homes and they face limited housing options in the rental markets and far too few dwellings that are both safe and affordable. As a consequence, Wisconsin continues to show rates of childhood lead exposure that exceed national rates. This burden from childhood lead exposures continues to threaten our long term productivity and to impose unnecessary costs on our publically funded educational and correctional systems.

Page 137: Unfortunately, Community Development programs to assist businesses, when compared to housing programs, are not as efficient in terms of clearly benefitting low to moderate income families.

Page 142: Of the 507 jobs estimated to be created or retained by the \$17.7 million/year to be spent on economic development, how many will benefit low to moderate income persons? How many of these jobs will provide wages and benefits that allow workers to obtain affordable health care?

Page 150: Economic development activities “must result in job opportunities for low to moderate income individuals”. How will Wisconsin assure that this goal is met? What system protections or repayment plans are in place to protect Wisconsin taxpayers if businesses should not be able to meet their projections for jobs for low to moderate income individuals?

Page 168: The plan states in the second paragraph under the heading “Actions planned to reduce lead-based paint hazards” that Wisconsin will “continue to seek resources at the state and local level to address identified lead hazards”. Why not commit Wisconsin to seek federal resources to address lead hazards? Typically US Department of HUD offers over \$100 million per year through competitive grants to support lead hazard control, lead hazard reduction demonstration and healthy homes programs.

Page 170: the Division of Housing staff has participated in the DHS lead poisoning prevention committees for years and staff has been a crucial partner allowing Wisconsin to make progress in protecting our children from lead paint hazards. Please continue this important and valuable commitment.

Innovative Plans for Revolving Loan Funds

Page 176: A plan is described whereby local units of government could partner with local non-profits to use federal funds as loans to finance programs to benefit low to moderate income persons. Then, when the beneficiary repays the loans to the non-profit organization, the funds lose their federal status and no longer must meet federal program requirements. What reporting or monitoring systems will Wisconsin adopt to assure that these recycled funds continue to benefit low and moderate income persons? If the loans were repaid to non-profits such as weatherization and community action agencies that are required by charter to address the needs of low income persons, this could be a viable way to protect the value and assure the continued public benefit of these recycled funds.

Department of Health Services, Lead and Asbestos Section.

10. Received on 2/5/2015

Lisa Marks, Administrator Division of Housing Department of Administration P.O. Box 7970 Madison, WI 53707-7970.

Re: DRAFT 2015-2019 Wisconsin Consolidated Plan

Dear Ms. Marks;

The Wisconsin Independent Living Network (WILN) Housing Committee is pleased to have this opportunity to provide feedback on the draft of the 2015-2019 Wisconsin Consolidated Plan. WILN is a statewide network that provides resources to help people with disabilities live independently. WILN is comprised of the eight Independent Living Centers in Wisconsin, the Wisconsin Coalition of Independent Living, and the Independent Living Council of Wisconsin. Following a philosophy of empowerment, inclusion, and community living, WILN works with people of all ages and all types of disability.

As the Consolidated Plan draft notes, people with disabilities, as a population, are disproportionately low income, unemployed, and underemployed. HUD's *2009 Worst Case Housing Needs of People with Disabilities Report* acknowledged that:

Renter households that include nonelderly people with disabilities are more likely than those that do not include people with disabilities to have very low incomes, experience worst case needs, pay more than one-half of their income for rents, and have other housing problems, such as living in inadequate or overcrowded housing.

With every housing barrier identified in the tables, people with disabilities are disproportionately impacted with the added barrier of accessibility. According to Table 26, 70% of residential properties in the state are 1-unit structures, with an additional 11% being 2-4 units (it would be safe to assume that the majority of this are duplexes), and another 4% being mobile home (or another non-permanent structure). As single-family homes don't fall under either the Fair Housing Act or Wisconsin's Open Housing Law, this means that at least 85% of Wisconsin residential properties are inaccessible. Even multi-family housing units were not built with the minimum accessibility standards of the Fair Housing Act until after March 1991. Given the age of Wisconsin housing stock, the vast majority of Wisconsin housing units, including multi-family units, are not accessible for people with disabilities. This presents a significant barrier for any household with a member with a physical or mobility disability.

The *Olmstead v. L.C.* decision on June 22, 1999 resulted in the Supreme Court of the United States declaring that people with disabilities had the right to live in the community with community-based support. The government is expected to act proactively to ensure the integration of people with disabilities. Distressingly, there is no mention of this mandate in the Consolidated Plan.

The Department of Health Services (DHS) provides supportive services for many people with disabilities in the state, including older adults. The Family Care, Family Care Partnership, and PACE programs served over 41,000 persons with disabilities as of August 2014. The IRIS program served 11,435 as of November 30, 2014. Those numbers doesn't include other programs such as Katie Beckett, Children's Long Term Support Waivers, Care4Kids, etc. Nor does it include the many people with disabilities who receive services from their family and friends or a private source of funding.

There is a great disconnection between the availability (and affordability) of accessible housing and those who need them. DHS spends money making homes accessible for people with disabilities, which frequently include bathroom modifications, door widening, or ramps and lifts.

It is estimated by the American Planning Journal that in the 100-year lifetime of a home built today, there is 60% probability that at some point, a resident will have a disability. ***The Division of Housing should require, at a minimum, Visitability for newly constructed housing and encourage the use of Universal Design.*** The state should also ensure that accessibility improvements should be a valid use of rehabilitation funding.

While the new state-funded housing search website, www.wihousingsearch.org includes some search features to aid people seeking accessibility, participation is voluntary. The state should mandate that rental housing funded by state programs use this tool. Furthermore, the Division of Housing should work with the Department of Health Services to ensure that households with a member who has a disability are aware of the availability of those units. DHS and WHEDA have set up a referral process for the Low Income Housing Tax Credit Program. The Division should consider asking grantees that create or preserve housing through monies from the Division to participate if feasible; not just for accessible units, but all rental units funded through the state.

WILN would like to take a moment to note that the Americans with Disabilities Act will be celebrating its 25th anniversary in July. This means that, after twenty-five years, there is no reason why municipalities should be requesting funding for accessibility improvements (with the exception of parks and pools which saw some new regulations). It is WILN's position that by this point, communities should be incorporating accessibility needs in their planning process, and should not be requesting CDBG funding for those purposes.

The Plan recognizes that many communities create housing barriers through zoning and land use decisions. The Plan implies that the State is powerless in the face of home rule. However, the WILN Housing Committee believes that the State does have some tools it can use. For instance, there is the funding for community and economic development as well as for planning. The Division can prioritize those funding for municipalities that have had successful affordable housing outcomes.

WILN appreciates the opportunity to provide feedback on the plan.

Sincerely,

Wisconsin Independent Living Network Housing Committee

11. Received on 2/6/2015

Comments on the Consolidated Plan:

Looks like you've taken a great inventory of the housing needs of our state and the Consolidated Plan reflect that. I noticed that one of your goals is not building new home owner housing- often having affordable homeowner housing in cities like La Crosse with aging housing infrastructure can greatly help stabilize neighborhoods. The regional model of distributing CDBG funds seems to have been quite successful.

Recently, it has been announced that the Affordable Housing Trust Fund funds may soon reach our state. We would encourage the DOA to administer these funds and sub-allocate them to the cities. Cities such as La Crosse have in-depth experience managing funds and having local control over the use of funds is critical. DOA would be a great partner on these funds.

City of La Crosse

12. Received on 2/9/2015

Please accept the following comments regarding the Consolidated Plan:

Local CDBG-RLFs should have a constrained timeframe within which to utilize their funds. If funds are not utilized in such a timeframe, then the funds are transferred to the regional pool for use. An appropriate timeframe might be 90 or 120 days after receipt the funds should be committed.

DOADOH should create guidance allowing for an easier reuse of CDBG-RLF funds across activity types. RLF funds that are collected should be deployable as rental rehabilitation funds similar to the regional funds. This would allow for small affordable housing projects in these communities to access an affordable source of capital and provide RLFs with a steady stream of repayment income.

The Division of Housing should be the entity charged with oversight and control of the National Housing Trust Fund dollars that are awarded to the state. These funds should be utilized statewide with 1/3 available to Milwaukee, 1/3 available to Madison and the remainder available on a statewide competitive basis. Funds awarded to Milwaukee and Madison should be awarded via agreements with those entities. Those agreements should contain required performance metrics that make their funds subject to recapture and reassignment into the statewide pool. Statewide funds should be allocated in a regional format with competition within regions.

Couleecap

Division of Housing Responses to Public Comments

	Commenter	Division of Housing Response
1	Ashland Area Development Corporation	The Division of Housing does not have regional Economic Development Revolving Loan Funds. Grants are made to municipalities. Municipalities may choose to form a regional Economic Development Revolving Loan Fund. The Division will consider your comments during the preparation of policies governing Revolving Loan Funds.
2	City of Elroy	The analysis of disproportionately greater need by race is mandated by HUD. There is no direct mechanism from this analysis that distributes or allocates funding by race. Since the race data includes both entitlement and non-entitlement areas there is no way DOH could directly determine any area's funding level by using this data.
3	Community Action Coalition for South Central Wisconsin	<ul style="list-style-type: none"> • The majority of Consolidated Plan data is prepopulated by HUD. In cases when it was not, a suitable statewide estimate was not available for some populations. • Text describing issues caused by the lack of shelter facilities in rural areas has been added to the Needs Assessment. • The Strategic Plan encourages the use of transitional housing in cases where it has been demonstrated to be efficient and effective.
4	West CAP	The incorrect references in the map and tables have been changed.
5	Couleecap	<ul style="list-style-type: none"> • The Division of Housing is reviewing options for communities to spend their Housing Revolving Loan Funds and will consider your comments during the preparation of policies and manuals governing Housing Revolving Loan Funds. We encourage municipalities to partner with regional CDBG Housing partners. • We have made changes to provide greater flexibility in the use of CDBG Revolving Loan Funds on page 145.
6	Options for Independent Living	The Division of Housing encourages use of Universal Design and Visitability in housing construction and rehabilitation activities, and language describing this has been added to the Consolidated Plan. Many of the housing units rehabilitated by Division of Housing programs have extensive issues requiring rehabilitation funding. The combination of a high demand for service and scarce funding means that in some cases, it is not possible to construct and rehabilitate all units to Universal Design and Visitability standards.
7	WISCAP	<ul style="list-style-type: none"> • Language describing the needs of farm workers, agriculture workers, and Spanish speaking populations has been added to the Needs Assessment. • The Division of Housing recognizes the importance of lead abatement in its HOME and CDBG programs. Language describing the lead safety issues faced by families with children has been added to the Market Analysis. The Division will continue to explore opportunities to seek federal resources to address lead hazards. • In response to the comments regarding economic development funding, providing economic opportunities to low and moderate income individuals will

		<p>provide the best safety net out of poverty. The number of jobs created using economic development funding is governed by federal standards enforced by the Division and all CDBG projects must meet national objectives. If enough applications meeting the criteria described in a Division of Housing program are not received in a given action plan year, the Division of Housing reserves the right to redirect the program's unused funds to other programs described in the method of distribution to ensure maximum utilization of funds.</p> <ul style="list-style-type: none"> Regarding defederalization of CDBG Revolving Fund Dollars, the regulations governing defederalization and HUD guidance make it clear that once these dollars are defederalized, units of government cannot monitor or otherwise interfere.
8	Council on Physical Disabilities	<ul style="list-style-type: none"> Additional language regarding the Olmstead vs. LC decision and the accessible housing and employment needs of those with physical disabilities has been added to the Needs Assessment. The Division of Housing encourages use of Universal Design and Visitability in housing construction and rehabilitation activities, and language describing this has been added to the Consolidated Plan. Many of the housing units rehabilitated by Division of Housing programs have extensive issues requiring rehabilitation funding. The combination of a high demand for service and scarce funding means that in some cases, it is not possible to construct and rehabilitate all units to Universal Design and Visitability standards. Persons with physical disabilities have been added as a target group under the "Affordable Housing" priority need. The Division of Housing believes that the current goals address the accessible housing needs of persons with disabilities, given that visitability and Universal Design are encouraged in Division housing programs. CDBG Disaster Recover funds must be used for rehabilitation activities that are disaster specific.
9	DHS Lead and Asbestos Section	<ul style="list-style-type: none"> The Division of Housing recognizes the importance of lead abatement in its HOME and CDBG programs. Language describing the lead safety issues faced by families with children has been added to the Market Analysis. The Division will continue to explore opportunities to seek federal resources to address lead hazards. In response to the comments regarding economic development funding, providing economic opportunities to low and moderate income individuals will provide the best safety net out of poverty. The number of jobs created using economic development funding is governed by federal standards enforced by the Division and all CDBG projects must meet national objectives. If enough applications meeting the criteria described in a Division of Housing program are not received in a given action plan year, the Division of Housing reserves the right to redirect the program's unused funds to other programs described in the method of distribution to ensure maximum utilization of funds. Regarding defederalization of CDBG Revolving Fund Dollars, the regulations governing defederalization and HUD guidance make it clear that once these dollars are defederalized, units of government cannot monitor or otherwise interfere.

10	Wisconsin Independent Living Network Housing Committee	<ul style="list-style-type: none"> • Additional language regarding the Olmstead vs. LC decision and the accessible housing and employment needs of those with physical disabilities has been added to the Needs Assessment. • The Division of Housing encourages use of Universal Design and Visitability in housing construction and rehabilitation activities, and language describing this has been added to the Consolidated Plan. Many of the housing units rehabilitated by Division of Housing programs have extensive issues requiring rehabilitation funding. The combination of a high demand for service and scarce funding means that in some cases, it is not possible to construct and rehabilitate all units to Universal Design and Visitability standards.
11	City of La Crosse	<ul style="list-style-type: none"> • New homeowner housing projects may be undertaken with HOME funds as special projects. • The Governor's Office has the authority to designate the state agency charged with administering the National Housing Trust Fund. We will forward your comments on to the Governor's Office.
12	Couleecap	<ul style="list-style-type: none"> • The Division of Housing is reviewing options for communities to spend their Revolving Loan Funds and will consider your comments during the preparation of policies and manuals governing Revolving Loan Funds. We encourage municipalities to partner with regional CDBG Housing partners. • We have made changes to provide greater flexibility in the use of CDBG Revolving Loan Funds on page 145. • The Governor's Office has the authority to designate the state agency charged with administering the National Housing Trust Fund. We will forward your comments on to the Governor's Office.